

The background of the entire page is a photograph of three wrapped gifts. The gifts are rectangular boxes wrapped in a textured blue paper. Each gift is tied with a wide, white, ribbed ribbon in a bow. The gifts are arranged in a slightly overlapping manner on a light-colored surface. The lighting is soft, creating gentle shadows.

CODE OF ETHICS

INSTRUCTION ON GIFT MANAGEMENT

Gifts and Invitations Policy

The purpose of this document is to set out the general policy on Gifts and Invitations. These new provisions must be applied in addition to the Code of Ethics.

How to handle it day to day?

As a matter of principle, Auto Nejma staff must refuse any gift or invitation that does not fall within a clear and transparent professional context.

In particular, any cash gift from third parties (customers, suppliers, external service providers) must be strictly refused, regardless of the amount offered and the circumstances.

Accepting gifts or invitations may place the employee under an obligation to the giver and thus impair his or her independence of judgement, which is one of the fundamental principles set out in the Code of Ethics.

In the same spirit, Auto Nejma intends to ensure that gifts or invitations given to a third party cannot be interpreted as an attempt to unduly influence that party's conduct or decisions.

However, for objective reasons, employees may receive or give gifts and invitations in the course of their professional relationships.

How to assess the professional context?

The gift must be offered or received in the course of business and be identifiable (logo, card, branded bag, etc.).

Inviting a customer must be motivated exclusively by a professional activity (meeting, presentation of a product or service, etc.).

How to assess whether it is clear and transparent?

The gift or invitation involves no hidden intention and could be known to everyone without causing any problem or raising questions. Its value and the way it is given can be documented so that it can be checked without difficulty if necessary.

Asking the right questions

The conditions under which a gift or invitation may nevertheless be accepted or given, so as not to harm relations with the stakeholder, are set out below:

Whether a gift or invitation is given or received, existing legislation sets no specific amount for our business sector. The following questions help determine the line between what is acceptable and what is not:

- 1- Is the value in line with the local standard of living? If it is higher, it must be refused, explaining Auto Nejma's principles in this respect.
- 2- Could the invitation or gift be reciprocated? You or the person concerned must be able to receive or return the same level of invitation or gift.
- 3- Where the invitation concerns several employees, the line manager's authorisation is required.
- 4- Invitations must always take place in a professional setting.
- 5- Is the context in which the gift/invitation is offered a special one (call for tenders, market entry, etc.)?

Don't face a difficult situation alone

If you have any doubts or would like further information, do not hesitate to seek advice from your line manager and/or the Compliance Officer.

Repeated gifts

Where gifts or invitations are repeatedly received from or offered to the same individual or legal entity, these thresholds must be assessed on the basis of their cumulative value over the same year.

Sponsorship and patronage

Finally, within the framework of the sponsorship and patronage initiatives implemented by Auto Nejma, the Gifts and Invitations policy allows invitations to be extended to representatives of our stakeholders. These initiatives are subject to specific measures defined at the level of each business activity.

Monitoring

Information on the giving or acceptance of gifts, invitations, etc. must be available to the Compliance Officer and/or the audit departments.

Follow the guidelines:

To facilitate decision-making, Auto Nejma has defined the following rules:

1. Accepting gifts



Permitted without authorisation

Promotional or courtesy gifts with an individual value below 500 DHS incl. VAT.



Subject to authorisation

- Promotional or courtesy gifts with an individual value between 500 DHS and 1,000 DHS incl. VAT.
- Authorisation from the line manager is required and must be formalised by email, specifying the giver.



Prohibited in all cases!

Promotional or courtesy gifts with an individual value above 1,000 DHS incl. VAT.

2. Giving gifts



Permitted without authorisation

- Promotional or courtesy gifts with an individual value below 500 DHS incl. VAT.
- Invoices must be issued in the name of Auto Nejma.
- The names of the recipient and/or company must be recorded.



Subject to authorisation

- Promotional or courtesy gifts with an individual value between 500 DHS and 1,000 DHS incl. VAT.
- Authorisation from the line manager is required and must be formalised by email, specifying the recipient.
- Invoices must be issued in the name of Auto Nejma.
- The gift must be clearly identifiable as an Auto Nejma gift.



Prohibited in all cases!

- Gratuities of any kind whatsoever (cash, bank transfer, credit, unjustified credit notes).
- All other gifts that do not comply with the Auto Nejma Code of Ethics.

3. Meals offered to/by business partners



Permitted without authorisation: Ordinary business meals

- The commercial and/or professional nature must be evident.
- Guideline amount: < 300 DHS incl. VAT per guest.
- When the invitation is voluntary and not made in expectation of anything in return or of preferential treatment.
- The names of the company and of the guests must appear on the expense report.



Subject to authorisation

- Invitations whose commercial nature is not clearly established.
- Guideline amount: between 300 DHS and 500 DHS incl. VAT per guest.
- Authorisation from the line manager is required and must be formalised by email, specifying the recipient.
- The names of the company and of the guests must appear on the expense report.



Prohibited in all cases!

Guideline amount: > 500 DHS incl. VAT per guest.

4. Invitations to events



Permitted without authorisation

- Events with a direct and unequivocal link to the company's business activities (e.g. trade fair).
- Guideline amount: < 300 DHS incl. VAT per guest.
- The invitation covers the event only and excludes travel, accommodation or activities organised outside the programme.
- Where a business partner contributes to the costs: must be recorded.



Subject to authorisation

- Events with an indirect link to, or elements unrelated to, the company's activities.
- Authorisation from the line manager is required and must be formalised by email, specifying the recipient.
- Guideline amount: between 300 DHS and 500 DHS incl. VAT per guest (approved by the line manager).



Prohibited in all cases!

Guideline amount: > 500 DHS incl. VAT per guest.