

Muster für einen Verhaltenscodex

(Auszug aus dem Code of Conduct des Unternehmens X.X.)

Hospitalities

1. **You may:**
Offer an employee, officer, shareholder, consultant, etc. of a customer (whether of the public or private sector) meals, refreshments, or short distance travel arrangements, provided that the expense:
 - is of nominal value
 - is offered in the course of a meeting or another occasion, the purpose of which is to discuss or conduct business bona fide or to foster business relations (e.g. visiting a X.X. factory, etc.)
 - appears either customary from a social perspective, which on occasion would also be returned by your counterpart as a personal favour not grounded in business considerations, or that is otherwise so minor in value that your counterpart is more likely to forget the same in the long run rather than to remember.
2. **You may:**
Bestow gifts of nominal value related to commonly recognised events or occasions, e.g. a wedding, birthday, a promotion, a major holiday such as Christmas, etc.
3. **You may:**
Give promotional articles imprinted with the logo of X.X. as approved by management.
4. **Don't:**
Make gifts of money.
5. **Don't:**
Make gifts that were solicited.
6. **Don't:**
Bestow repeat gifts of nominal value which add up to a value which in aggregate is able to compromise the recipient's independent judgement. As a rule of the thumb, the adequate value of gifts bestowed should not exceed USD 150 per year for individual.
7. **Ask yourself:**
Would I initiate or continue a business relationship with X.X. because of the gift in question if I were the recipient, or would t the initiation or continuation of the business relationship with X.X. be compromised in the absence of the gift? In either (affirmative) case, refrain from bestowing the gift or making the expense. In the event of doubt, contact your local compliance officer or your direct superior.

Quelle: Dr. iur. Mark Livschitz, Baker & McKenzie

PS: Mehr zu diesem Thema erfahren Sie im Seminar "Compliance Management in der Praxis":
www.vereon.ch/ark