



Dor Group

Gifts and Entertainment Policy

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Chapter: 01- Organization and management

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Subsection: 02- Human Resources

Date	Change	Edit (name, role)	Approval (name, title)	Version
30/07/2023	New SOP	Anat Halimi, HR Manager	Dr. Ran Avidov – QC and QA Manager	1.0

Gifts and Entertainment Policy

1. About the Policy

The purpose of this policy is to establish clear guidelines and expectations regarding gifts and entertainment for employees of Dor Chemicals Ltd. The policy aims to ensure ethical conduct, prevent conflicts of interest, and maintain transparency in business relationships.

2. Scope

This Gifts and Entertainment Policy applies to all employees of Dor Chemicals Ltd and its subsidiaries and governs the acceptance and offering of gifts and entertainment in business-related activities.

3. Definition of Gifts

In the context of this policy, a gift refers to the acquisition of something of value or goods without consideration, including but not limited to tangible items, grants, guarantees, discounts, or any benefit of material value. It encompasses both face value and non-par value gifts, commemorative items, or any form of benefit intended to influence business decisions or gain an uncompetitive advantage. It is important to note that a gift whose monetary value does not exceed NIS **100** will not be considered a benefit under this policy.

3.1 Appropriate Gifts

Dor Chemicals Ltd recognizes that there may be instances where accepting certain gifts is considered appropriate and within the boundaries of ethical business practices. These situations include gifts of nominal value (less than NIS 100), promotional items of general distribution, or gifts that are customary in a specific cultural or business context. However, it is important for employees to exercise good discretion and judgment when accepting such gifts to avoid any conflicts of interest or perceptions of impropriety. The acceptance of appropriate gifts should not compromise the integrity or impartiality of employees in their decision-making processes or create



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a sense of indebtedness. If there are any doubts about the appropriateness of accepting a gift, employees are encouraged to consult with their supervisors or the designated ethics officer for guidance.

3.2 Inappropriate Gifts

Dor Chemicals Ltd strictly prohibits the acceptance of gifts that are lavish, extravagant, or could be perceived as an attempt to unduly influence business decisions or gain an unfair advantage. Employees must refrain from accepting gifts that exceed nominal value (NIS 100 - see policy 01-01-004 for details) or are intended to improperly influence their judgment or actions. Inappropriate gifts may include cash or cash equivalents, expensive personal items, travel compensation, excessive entertainment or hospitality, or any gift that could compromise the integrity, impartiality, or reputation of the company. Employees should exercise good judgment and promptly decline any gifts that fall into these categories. If in doubt, employees are encouraged to consult with their supervisors or the designated ethics officer for guidance.

4. Guidance on Gifts and Entertainment

Under no circumstances shall employees accept, offer, or make any kind of illegal payments, wages, gifts, donations, or similar forms of benefit intended to gain an uncompetitive advantage or influence business decision-making. Any gifts or favors received by employees will be fully disclosed in accordance with the "Bribery and Gift Policy" (01-01-004).

Employees are prohibited from requesting or receiving benefits directly or indirectly through another person or entity, except for gifts and discounts given to all employees as per the company's policy. If an employee receives a gift or benefit, they must report it immediately and in writing to their supervisor. The supervisor will then inform the CEO, who, in consultation with the company auditor, will provide guidance on how to handle the situation.

5. Reporting Concerns

Dor Chemicals Ltd encourages open communication and provides multiple avenues for employees to share their concerns, questions, suggestions, or complaints. Employees are



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encouraged to first discuss their concerns with their supervisor. If they are not comfortable or satisfied with the response, they can also reach out to the human resources manager. Supervisors and managers have a responsibility to report complaints or concerns regarding ethical and legal violations to the company's ethics officer, who is responsible for investigating and reporting to the CEO.

6. Confidentiality and Anonymity

Reports of violations or suspected violations can be filed confidentially by the complainant. The company will make every effort to keep the information confidential during the investigation process. Employees have the option to report anonymously, although disclosing their identity is encouraged for a thorough investigation. While anonymous reporting may make it challenging to investigate matters fully, the company respects the privacy and confidentiality of employees.

7. Responsibility

Responsibility for compliance with the Gifts and entertainment policy applies to all Dor workers.

8. Applicability and validity

This policy is valid from the date of issue.

9. Sources For Additional Information

- Dor Employee Handbook
- Bribery and Gift Policy (01-01-004)

Dor Chemicals Ltd recognizes that policies need to evolve with changing times and practices. The company is committed to regularly reviewing and updating this policy to ensure it aligns with legal requirements, industry best practices, and emerging ethical standards. The evolving nature of this policy reflects the company's dedication to maintaining the highest standards of ethics and integrity in its operations.