



Gift & Entertainment Policy

Wilson is committed to, and expects from its employees and suppliers, the highest ethical standards of business conduct and compliance with laws and regulations in the countries where we operate. Suppliers shall not (and shall insure that its employees shall not)

- either directly or indirectly, pay, promise to pay, authorize the payment of, or transfer, money, or anything of value, or offer any inducement in any form to any employee or representative of Wilson, or to an official of any government agency or body, to secure any advantage or benefit in relation to doing business with Wilson, or influence the act or omission of any of the aforesaid persons in order to obtain or retain business, or obtain any improper advantage or benefit
- Obtain or maintain business through illegal conduct or practices of unfair competition.

Wilson employees are not permitted to

- accept gifts of more than nominal or reasonable value (the term gifts of more than nominal or reasonable value includes, without limitation, loans, excessive entertainment or other substantial favors) from suppliers
- Solicit gifts or favors of any kind and value from suppliers.

Suppliers are required to immediately inform Wilson of any act (or omission) of any Wilson employee(s) not in compliance with the foregoing.

It is the supplier's responsibility to disclose if an employee of Wilson has a direct relationship with any of the officers or management members of the vendor.

MAY 2010