Excerpt from Ethics Code of Conduct

4.4 Gifts, hospitality and expenses
The individual must not, directly or indirectly, accept gifts except for promotional items of minimal value normally bearing a company logo. Other gifts may be accepted in situations where it would clearly give offence to refuse, in which case the gift must be handed over immediately to Statoil and will be regarded as Statoil property. Hospitality such as social events, meals or entertainment may be accepted if there is a clear business reason. The cost of any hospitality must be kept within reasonable limits. Travel, accommodation and other expenses for the individual in connection with such hospitality must always be paid by Statoil. The above principles also apply in the reverse direction, so that no individual acting on behalf of Statoil may, in their dealings with customers, suppliers and other parties, offer or agree to pay for gifts, hospitality or other expenses that would violate these principles. Particular care must be taken in dealings with public officials. Members of the CEC may, on special occasions where custom requires it and where there can be no perception of impropriety, approve the offer or the acceptance of a gift of a higher value than indicated above on behalf of Statoil. Before responding to an invitation you should consider the Awareness questions for hospitality listed in Appendix A. All matters concerning the acceptance or offer of gifts, hospitality and similar advantages must be discussed and agreed between the individual and their superior, except where such advantages without doubt are acceptable according to the above. Even where no preapproval is required, the superior should be informed to secure openness.

Appendix A

Awareness questions for hospitality

With reference to section 4.4, before responding to an invitation you should consider the following Awareness questions for hospitality:

1. Why am I being offered this, and is anything expected in return?
2. Is there a clear business reason for Statoil, and am I the right person to attend?
3. Are there ongoing negotiations, procurement processes, or other matters requiring a particularly careful approach?
4. What is the hospitality, are the costs reasonable and is travel/accommodation covered by Statoil?
5. Could I defend my participation in public?
6. Am I offered hospitality frequently by the same host?
7. Are representatives of other companies attending?
8. If I am the only participant from Statoil, is there a special reason for this and has it been approved by my superior?
9. If spouses or partners are participating, is there sufficient reason for this and has it been approved by my superior?
10. Has the hospitality/entertainment been discussed with my superior?

And would Statoil offer similar hospitality?

Have you discussed with your superior, and you are both still uncertain? Contact legal compliance here.