

Incentives/Gifts/Promotions Policy

From time to time, the company may engage in promotions with its customers to provide incentives to those customers who purchase certain products in sufficient quantities from the Cyclops Group*. Examples of incentives or promotions are things such as electronic devices or other things of value that are offered to customers or customer representatives when that customer's sales reach predetermined benchmarks. However, because we are committed to observing ethical and legal obligations against practices such as bribery, and because we strive to maintain a well-grounded and ethical culture within our company, Cyclops and its employees may only engage in company-sanctioned incentive programmes that adhere to the following strict rules:

1. The company and its employees may only offer incentives or promotions that are part of an officially-sanctioned Cyclops programme that has been set forth in writing, and approved by the Cyclops Group Sales Manager. No promotions or incentives may be offered that are not officially sanctioned by the Cyclops Group.
2. Only employees who are authorised to engage in an incentive programme, by the Cyclops Group Sales Manager in writing, may offer incentives or promotions.
3. Promotions are used as part of our marketing strategy and are not designed to coerce, persuade or in any way influence a customer in the sales process. No sales prices can be adjusted in relation to any promotions.
4. The Cyclops Group limits incentives or promotions that may be offered. To begin with, only one incentive programme per customer will be active at any given time. Therefore, the Cyclops Group and its authorised employees may only offer the particular company incentives that are available at that time. No other incentives may be offered.
5. The Cyclops Group limits the pound sterling value of these incentives that may be offered to a customer, to a reasonable amount. Therefore, the maximum value pound sterling amount that may be offered to a customer is £500.00 (five hundred pounds). No cash incentives are allowed.
6. The Cyclops Group limits the number of times a promotion, which any particular customers may receive as an incentive, to a maximum of one per month.
7. Any customer who qualifies to receive a promotional item, may only receive the promotional item from the Cyclops Group. The customer may not exchange the offered item for cash or cash equivalent.

8. No promotions or gifts of any kind may be offered to government officials, nor may they be offered to any representatives of military departments or any subcontract companies working directly or indirectly for government contracts. Any promotions or incentives being offered to officials of foreign governments require special scrutiny because of special laws that may apply. Note that employees of businesses, which are owned in whole or in part by a government, may be government officials. If you have any concerns that a customer who is interested in participating in a Cyclops Group incentive programme may be a government official, please discuss it with the Cyclops Group Sales Manager.
9. Any customer that has been awarded an incentive must be given a copy of the 'Cyclops Group Incentives/Gifts/Promotions Policy' and, by acceptance of the incentive, agree that they are free to accept such promotions.
10. Any employee who offers incentives or promotions that are not in compliance with this policy may be subject to discipline up to and including dismissal.
11. Any incentives under the value of £25 (twenty-five pounds) are exempt under the incentives/gifts/promotions policy as gifts of this value can be sent without customer approval**.
12. Any incentive of free shipping only includes shipping up to the value of £100 (one hundred pounds). For any shipping that exceeds this amount, the excess must be covered by the customer.

Any employee who has questions about this policy (or about any given promotional programme in place at any particular time), should contact the Cyclops Group Sales Manager.

*The Cyclops Group includes Cyclops Electronics Ltd, Trading Specialists and Global Supply Services.

**Low cost items include promotional pens, notepads, keyrings, USBs, mugs, etc.