

2018/2019 ANNUAL NOTICE TO VENDORS



GIVING GIFTS TO ORION EMPLOYEES

"No Employee may accept any gift in exchange for giving special treatment or favor to the giver."

Code of Business Conduct and Ethics Policy, Section 4.3 Gifts.

CONFLICTS OF INTEREST

"A conflict of interest exists when an employee's absolute duty to give his or her undivided business loyalty to Orion can be affected by actual or potential personal benefit from another source. Each employee is expected to avoid any influence, interest, association or relationship that interferes, might interfere or might appear to interfere with the employee's independent exercise of judgment in Orion's best interest...."

Potential Conflicts of Interest are *"When an employee...accepts any gift, credit, payment, service or anything else of more than token or nominal value from an actual or potential customer, supplier or competitor of Orion."*

Corporate Ethics & Legal Compliance Policy, Section 2 Conflicts of Interest.

ACCEPTING GIFTS FROM ORION EMPLOYEES

Acceptance by an Employee of a Vendor *"gift, credit, payment, service or anything else of other than token or nominal value ... [from an Employee of Orion]...may constitute a commercial bribe, which may also be a violation of law. Commercial bribery is also against the policy of Orion, and no employee may engage in such bribery on behalf of Orion."*

Corporate Ethics & Legal Compliance Policy, Section 9 Compliance with other Laws.

A Vendors giving or offering to give money or anything of value in an attempt to influence the action of a foreign government official or other public official is unlawful.

Corporate Ethics & Legal Compliance Policy, 9 Compliance with other Laws and Anti-Corruption/Foreign Corrupt Practices Act Policy

Report any suspicious wrong doings including but not limited to unfair competition from other vendors as a result of gifts given to Orion employees. It's confidential and anonymous. **Call Orion's Whistleblower Hotline 1-866-777-7840.**

(All messages are distorted to protect the caller's identity.)

