

Date Released: 16-SEP-2021			Rev: A	
Doc Title: Company Gifts				
Function/Owner: Legal/Corporate Compliance	Policy Num	olicy Number: 10.2		
Formerly: "(1) Gift Giving Policy, (2) Acceptable Gifts List," (1) 08/01/2018, (2) 11/21/2019, Policy No. (1) N/A, (2) N/A		Page <b>1</b> of <b>2</b>		

## 1.0 PURPOSE:

The purpose of this policy is to support Albany International Corp. ("Albany" or the "Company") compliance with all applicable international and national laws regarding bribery and corruption, as well as set forth Albany's expectations for ethical business behavior associated to the giving of company gifts during the course of regular business.

## 2.0 SCOPE:

This policy applies to all Company employees, managers, officers, including those of Company subsidiaries where located. It also applies to any party acting on our behalf. If you are responsible for managing a party authorized to act on our behalf (for example, a Sales Agent or Distributor), it is your responsibility to ensure that that party has received, and agrees to abide by, this Policy. Any failure by you, or a party for whom you are responsible, to strictly adhere to this Policy may result in disciplinary measures up to and including termination.

### **3.0 DEFINITIONS:**

Term / Acronym	Definition
N/A	N/A

### 4.0 POLICY:

## 4.1 Gift Giving

Albany recognizes that nominally valued gifts can build goodwill and be part of normal business relationships. Albany also rigorously upholds its commitments to ethics in every area of its business. Any business partner that would violate, or expect us to violate, this policy is not a partner with whom we want to do business.

In the event this Policy conflicts with a stricter local law or regulation, the law or regulation of the respective local territory will retain ultimate authority. In no event should gifts be offered to public or governmental officials.

Nominally valued gifts are appropriate to promote the Albany brand. Accordingly, any gift must be purchased from the Albany Company Store.

## 4.2 Exceptions to the Policy

Exceptions to this requirement are available with the consent of the Legal Department and a senior leader or your business unit. Please consult the Legal Department or email policy@albint.com if you would like to request an exception. The Legal Department will facilitate the exception request process. (Exceptions could include seasonally and culturally appropriate gifts in different regions of the world.)

The gifts listed under the following section describes gifts which are acceptable to give and do not require preapproval in the manner described above. The list of acceptable gifts is subject to change at the discretion of

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the Legal Department and many be altered at any time, therefore it is important for employees who intend to furnish gifts to routinely review this policy.

# 4.3 Acceptable Gifts List

In addition to gifts available from the Albany Company Store, these gifts do not require pre-approval from the Legal Department:

- Moon cakes;
- Common food items, such as ham, turkey, mixed nuts, chocolate, cookies, biscuits (check with Corporate Compliance and the Legal Department if you are unsure);
- Wine or other alcoholic beverages (reasonable cost only) either as a gift to an individual or table gift in Australia for "bring your own" alcohol restaurants;
- Gift cards to named restaurants, stores, wine shops or coffee shops (NO AMEX, VISA, MASTERCARD) (reasonable value only)
- Holiday wreath or flower arrangement;
- Prepackaged holiday boxes or gift baskets (e.g., those containing food and/or wine).

# 4.4 Prohibited Gifts and Notes to the Policy

Gifts and recipients of gifts which are prohibited by this policy include:

- Cash or cash-equivalent payments (e.g., VISA gift cards);
- Gifts to customers if prohibited by existing Company contracts;
- Gifts to public or government officials;

For every circumstance wherein a gift is given, employees must document the following:

- 1. The gift itself;
- 2. The gift's value;
- 3. The gift's recipient; and
- 4. For what business purpose the gift was given.

A recipient of Company gifts may not receive multiple gifts over the course of the year or a certain period of time in which the aggregate of such gifts could be considered lavish or inappropriate.

## 5.0 FREQUENCY OF REVIEW AND UPDATE:

The Legal Department and the Assistant General Counsel will review the policy annually to determine if updates are needed, as well as to assess organizational compliance with the policy.

## 6.0 ADDITIONAL POLICIES TO CONSIDER:

Business Ethics Policy (10.0)

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