

Reporter Instructions for Gifts/Hospitality/Government/Donation Disclosure Form

Purpose: Instructions for reporter to submit a Gifts/Hospitality/Government/Donation Disclosure Form

A. POLICY CERTIFICATION

1. **Gift/Hospitality Disclosure:** If gift or hospitality disclosure please review the following Tenneco policies..
 - [Gifts and Hospitality \(ELS 109\)](#)
 - [Anti-Corruption \(ELS 102\)](#)
 - [Conflict of Interest \(ELS 104\)](#)
2. **Charitable donations:** If charitable donation please review the [Community and Government Affairs Policy](#).

B. YOUR INFORMATION

1. **Name and contact information:**
Enter your name, phone number, email, job title and business unit (NOTE: Use the business unit that you are reporting under).
2. **Location**
Use the look up feature to search for the location you are assigned to. Search by city, state, or country for an accurate list of all Tenneco locations. If your location is not listed, use the most relevant location.

C. OUTSIDE PARTY

1. **Organization & Contact Information:** This section is used for the outside person that the exchange was made with.
 - a. **Role:** What role did this person or organization have in the exchange (e.g., recipient, provider, or witness)? If 'other' was chosen, then please describe in detail.
 - b. **Relationship to company:** Use the drop down to choose what relationship this outside party has with Tenneco. If 'other' is chosen, please describe in detail.
 - c. **Official or employee of a government entity or foreign government:** Is the third party a government official or an employee of a government entity? Select yes or no. If you do not know the answer to this question, then please contact Global Compliance

at AskLaw@Tenneco.com to discuss before completing the disclosure. It is important to answer this question correctly.

NOTE: A government official is any appointed or elected official, officer, or employee who works at the expense of taxpayers or the government or state - owned, controlled, or funded companies, or any person working in specific functions or industries who are defined or regulated as a government official by local law.

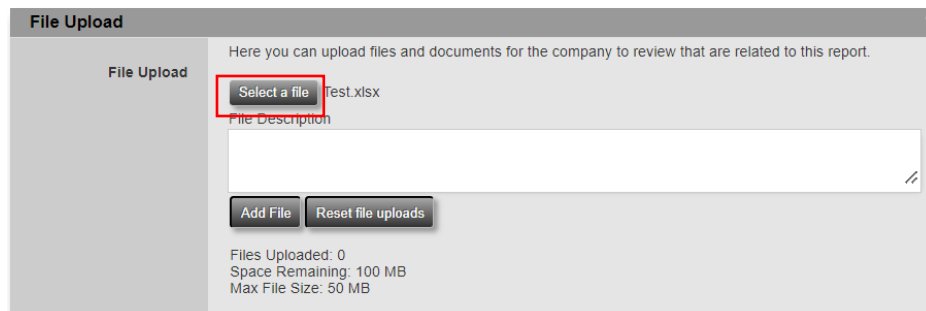
- d. **Name, organization/entity, job title, phone number and email** of outside party (contact) must be provided.

2. Additional Recipients

- a. If the disclosure was for meals or entertainment provided by Tenneco and there was more than one recipient, please mark yes. If the disclosure is for meals or entertainment that you received, then you do not need to list the other attendees.
- b. You can add each person individually in the form. If there were a significant number of participants (e.g., 10 or more recipients), you can upload a list as an attachment but it must include company name, recipient name, and job title for each person. Attachments can be loaded in the File Upload section of the form.

D. FILE UPLOAD

- 1. Please upload any documents pertaining to the disclosure of charitable donations.
- 2. To upload a file:
 - a. Click on 'select a file'



- b. Once file has been selected you must click on 'add file' in order for the document to uploaded. The files uploaded field will populate with the number of files successfully loaded.

E. DETAILS OF EXCHANGE

1. Disclosure Type

This answer will default depending on how you responded to the question under "Outside Party" - Is the outside party is an official or employee of a government entity or a foreign government? Remember, it's very important that you answer that question correctly.

2. Exchange Date

Select the date of when the exchange took place or is expected.

NOTE: If the exchange is scheduled to take place on a non-workday (e.g., over the weekend or on a public holiday) indicate further details regarding the exchange in the notes section.

3. Role in Exchange

Choose what role you had in the exchange (e.g., recipient, provider, or witness)? If 'other' was chosen, then please describe in detail.

4. Purpose

a. Purpose of exchange: Choose from the drop down the most relevant purpose of the gift/donation.

- If 'charitable donation' is chosen you must provide name and address of charity.

- If 'Other' is chosen, please provide specific details of purpose.

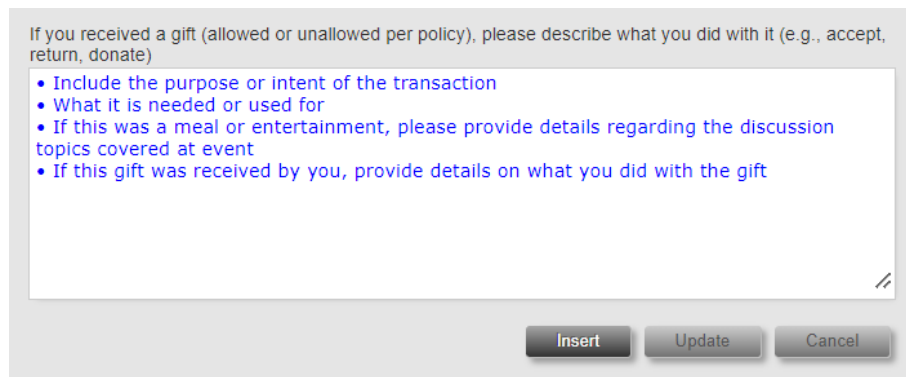
5. Items Exchanged

- a. **Type of item:** Select from the drop down the item that was exchanged.
- b. **Classification:** Based on the type of item chosen you will need to choose a specific classification which provides more details about the item.
- c. **Item details:** enter the name of item, the recipient count (this cannot be 0) and the value in **USD**. Unfortunately, no other currency is available. You can note the local currency in the comments section of "Items Exchanged" for informational purposes.)

Example: For meals, enter total number of meal attendees and the meal cost per person. The total should agree to the total cost of the meals to be approved.

NOTE: If you are an employee intending to purchase a gift, please thoroughly review the gift and hospitality policy as there are rules on what is acceptable and unacceptable.

- d. **Notes box:** please enter details regarding the purpose of this exchange such as:
 - The purpose or intent of the transaction. Why is it needed?
 - For a meal or entertainment, please provide details regarding the discussion topics to be covered at the event
 - If this gift was received by you (allowed or unallowed per policy), provide details on what you did with the gift (e.g., accept, return, donate).



If you received a gift (allowed or unallowed per policy), please describe what you did with it (e.g., accept, return, donate)

- Include the purpose or intent of the transaction
- What it is needed or used for
- If this was a meal or entertainment, please provide details regarding the discussion topics covered at event
- If this gift was received by you, provide details on what you did with the gift

Insert Update Cancel

Example:

Step 1: Fill out all required fields

Step 2: Click insert

Items Exchanged

Using the input controls below, create a list of records.
(At least one record is required.)

Name	Type of Item	# Rcpt.	\$ Value	Total
Sample	Cash or Cash Equivalent	1	\$ 20.00	\$ 20.00

Type of Item: Cash or Cash Equivalent
Classification: Cash

Name of Item: Sample
Recipients: 1
Value/Rcpt.: \$ 20.00
Total: \$ 20.00

Please provide detailed information about the proposed charitable donation or proposed gift and/or hospitality to be exchanged including

- Purpose/intent of the transaction. Why is it needed?
- If meal or entertainment, please list the business discussion topics to be covered

If you received a gift (allowed or unallowed per policy), please describe what you did with it (e.g., accept, return, donate)

Insert Update Cancel

Step 3: You can then add, delete, or edit items as needed.

Items Exchanged

Using the input controls below, create a list of records.
(At least one record is required.)

Name	Type of Item	# Rcpt.	\$ Value	Total
1. Sample	Cash or Cash Equiva	1	\$ 20.00	\$ 20.00
				\$ 20.00

Add Item Edit Delete

Type of Item: Cash or Cash Equivalent
Classification: Cash

Name of Item: Sample
Recipients: 1
Value/Rcpt.: \$ 20.00
Total: \$ 20.00

Please provide detailed information about the proposed charitable donation or proposed gift and/or hospitality to be exchanged including

- Purpose/intent of the transaction. Why is it needed?
- If meal or entertainment, please list the business discussion topics to be covered

If you received a gift (allowed or unallowed per policy), please describe what you did with it (e.g., accept, return, donate)

F. APPROVAL & ACKNOWLEDGMENT

1. Approval

Confirm the Gifts/Hospitality/Government/Donation Disclosure form includes the appropriate manager approval.

NOTE: For hospitality in China, if the hospitality expenditure is greater than CNY 1500 (approximately \$220 USD), your department head's written/email approval is required.

Items Exchanged

♦ Using the input controls below, create a list of records.
(At least one record is required.)

Name	Type of Item	# Rcpt.	\$ Value	Total
♦ Type of Item (Select One)				
♦ Name of Item 	♦ Recipients 1 (1-1000)	♦ Value/Rcpt. \$ 0.00 (\$USD # ##)	Total \$ 0.00	

(Examples: Round trip airfare PDX to ORD, Tickets to Cubs game, Concessions at Concert, Logoed swag, etc...)

2. Approver Information

Provide the name, job title, and email of approver

3. Date

Enter the date of when approval was obtained. If this was a verbal approval, provide the date of when verbal approval was granted.

4. Method

This may take the form of a written or verbal approval from the manager. For written approval, Reporter must paste the content of the approval email in the notes box. If approval was obtained verbally, employees must input the date on which their manager provided approval on the form.

Approval & Acknowledgement

♦ Have you obtained approval(s) for this transaction in accordance with the related policies?
☒ Yes ☐ No
 (Select One)

Approver Information

Prefix ♦ First Name M.I. ♦ Last Name
 (Select One)

♦ Job Title ♦ Email
 ((Format: username@domain.com))

Date

mm/dd/yyyy
 (Format: mm/dd/yyyy)

Method

♦ How did you receive approval?
☒ Written/Email ☐ Verbal
 (Select One)

♦ Please copy and paste the written/email approval.
 Report must paste the content of the approval email in the notes box. If approval was obtained verbally, employees must input the date on which their manager provided approval on the form.

Please include: The message header area showing who sent the approval and who received the approval.

G. PASSWORD & SUBMIT

1. Submission

Upon submission of this form, you will be issued a Report Key. Please write this information down along with your password, in a secure and private place. Neither your report key, nor your password, can be recovered, or reset once this report has been submitted.

2. Follow up

At the top of the form, select "Follow-Up" to provide any additional information or to interact with the investigation team at any time in the process.

NOTE: You will need your report key and password from your original submission

The screenshot shows a web interface with a green navigation bar at the top. The bar contains several tabs: 'Code of Conduct', 'Anti-Corruption Policy', 'Community and Government Affairs Policy', 'Gifts and Hospitality Policy', 'Ethics & Complaint Hotline', 'Disclosure Reporting Instructions', 'Reporter Follow-Up', and an empty tab highlighted with a red border. Below the navigation bar, a message states: 'Items marked with a red diamond ♦ are required fields.' The main content area is titled 'Follow-up on Previously Completed Report'. It lists the following actions: 'Report Follow-Up will allow you to:' followed by a bulleted list: 'Upload documents', 'Respond to follow-up questions/comments', and 'Provide additional information'. Below this list are two input fields, each preceded by a red diamond ♦: 'Report Key' and 'Password'. A 'Login' button is positioned at the bottom right of the form area.