

Corporate gifts and hospitality policy

Introduction

This policy sets out the Company's stance on the acceptance of gifts and hospitality in accordance with the Bribery Act 2010. The following policy will operate alongside the Company's anti-bribery policy and procedures.

Employees should be aware of the definitions of 'gift' and 'hospitality' given below, however, these are not exhaustive. Whether an item or offer constitutes a 'gift' or 'hospitality' may need to be discussed with your line manager on an individual basis.

Receiving gifts

The Company realises that the giving and receiving of gifts and hospitality where nothing is expected in return helps form positive relationships with third parties where it is proportionate and properly recorded. This does not constitute bribery and consequently such actions are not considered a breach of this policy.

Gifts include:

- money
- goods (flowers, vouchers, food, drink, event tickets when not used in a hosted business context)
- services or loans given or received as a mark of friendship or appreciation.

Gifts of a very low monetary value are permitted; acceptance of any other gift is not authorised.

Employees are advised to use their judgment on whether a gift would meet the definition of "appropriate". When considering this, employees should consider the bearer of the gift and context in which it is offered. Could it be seen as an incentive during a tendering exercise, for example. Employees who require clarification on the appropriateness of an offer must speak with their head of department before accepting.

Accepting hospitality

Employees are permitted to accept offers of corporate hospitality on the condition that prior authorisation is sought from the employee's head of department.

Hospitality includes:

- entertaining
- meals or
- event tickets (when used in a hosted business context) given or received to initiate or develop relations.

Hospitality will become a gift if the host is not present.

Offering gifts and hospitality

No gift should be given nor hospitality offered by an employee, or anyone working on our behalf, to any party in connection with our business without receiving prior written approval from a VP or Executive.

At no time will approval be granted to offer a gift or hospitality in the name of the Company. All gifts and/or hospitality must be offered to other parties in the name of the employee making the offer.

Gift and hospitality register

In all instances, prior to accepting an offer, or making an offer, of a gift and/or hospitality, the details of the offer must be provided to Group HR Business Partner who will record this in the gift and hospitality register.

The employee will be required to provide the name of the offeror or recipient, details of the gift/hospitality, an estimated value and the intention or context behind the offer, where this is known. In cases where prior approval is needed, this will also be recorded with the details of the approving manager.

A failure to notify the Group HR Business Partner to ensure the gift and hospitality register is updated accordingly may be deemed a disciplinary offence which will be addressed under the internal disciplinary policy.