

## **Gifts and Hospitality Policy**

### **Purpose**

The company is aware that from time to time suppliers, customers and business contacts may send gifts as an expression of appreciation for products and services that the company provides. The company also recognises that the achievement of customer, supplier and business satisfaction is as a consequence of the hard work and effort of many individuals and not necessarily the sole effort of the recipient of the gift.

This policy sets out the correct procedure for the receipt of gifts and hospitality in order that a fair process is applied across all work areas and that no one individual is rewarded exceptionally above the effort of others.

### **Scope**

This Policy applies to all employees of the company including Directors (irrespective of length of service, status or hours worked)

This policy is not contractual and its content may be changed from time to time by the company.

### **Policy Statement**

It is important to be aware of the damage to morale and engagement caused in circumstances where gifts are received and retained by some individuals and not shared with wider teams or employees. In most cases gifts are provided as a “thank you” for business activity achieved with the input and work of many. This policy relies on honesty and transparency in order to create a fair and equitable workplace and an environment where employees feel appreciated and treated fairly. For this reason retaining gifts is prohibited and the following policy should be applied at all times, irrespective of the gifts or hospitality items in question or the time of year in which they are received.

- You must declare all offers or receipt of gifts and hospitality to the company whether or not the gifts are addressed to you or your department, unless you are advised otherwise by your manager.
- Declarations must be recorded on the Gifts and Hospitality Register. The register will be maintained by the Managing Director’s PA .
- You should not be seen to be securing valuable gifts and hospitality by virtue of your job or status.
- You should not accept or provide any gift or hospitality if acceptance/provision will give the impression that you have been influenced/are deemed to be influencing while acting in an “official capacity”.

## **Procedure**

The conduct of an individual should not create suspicion of any conflict of interest between official duty and private interest. The action of individuals acting in an official capacity should not give the impression to any organisation with whom they deal or to their colleagues, that they have been, or may have been, influenced by a benefit to show favour or disfavour to any person or organisation. It is a disciplinary offence for a member of staff to accept any benefit as an inducement or reward that leads them in an official capacity to show favour, or disfavour, to anyone. This policy should be read in conjunction with the company's anti-bribery policy.

Articles of low intrinsic value can be accepted but on the premise that they are donated to the company workplace free raffle that will take place from time to time. If a workplace raffle is held then all employee names will be entered into a free draw and the accumulated gifts will become prizes.

### **Accepting offers of hospitality – genuine business reasons**

It is recognised that, in the course of carrying out your duties, you will need to ensure good relationships with existing and future clients and stakeholders. This may involve the receipt of modest working lunches, dinners and attending events. This is acceptable where there is a direct link to working arrangements and a genuine business reason for it.

You must not accept free holidays from a current or potential client. These invitations should be recorded in the register whether received or declined. Modest hospitality, provided it is reasonable and not excessive, for example lunches in the course of working visits, may be accepted. If you accept hospitality for example invitations to sporting or other social events, you must obtain the prior approval of your line manager (verbally or by email) and make a declaration after the event in the Register of Gifts and Hospitality which is held by the Managing Director's PA.

As part of the company's normal business activities, there may be circumstances where it is appropriate to provide reasonable gifts or hospitality to third parties. Where this is deemed necessary, prior approval must be obtained from the relevant line manager. This will normally be carried out by the Marketing Team and Executive Directors. It is acceptable to provide modest hospitality in the way of working lunches and/or dinners to existing and potential clients and stakeholders subject to a genuine business reason.

### **How to declare a gift or hospitality**

You should make your declaration as soon as possible after the offer or receipt of gifts or hospitality. Declarations must be made to the Managing Directors PA and should include:

- Date of offer of gift or hospitality, and date of event where relevant;
- Name, job title and organisation of recipient / provider;
- Nature and purpose of gift or hospitality received or declined;
- The name of any other organisation involved;
- Estimated value

The board of directors have overall responsibility for ensuring this policy complies with our legal and ethical obligations.