



Ref 1.6 Group Policies

1.6.10 Corporate Gifts and Hospitality Policy

Version 1.3



Overview

The purpose of this policy is to protect the company and all of our staff from stepping beyond the limits of acceptable corporate hospitality and engaging in behaviour that could amount to bribery or prompt allegations of bias being exercised in favour of particular clients, suppliers or contacts. It is important that the boundaries of this policy are adhered to because failure to exercise responsible corporate hospitality could result in criminal prosecution of both the company and individual staff members under the Bribery Act 2010.

Failure to follow the rules in this policy will be a disciplinary offence and, in some cases, could amount to gross misconduct leading to dismissal. Where staff are considered to be in breach of the Bribery Act 2010 the police will be informed.

General Principles

The giving or receiving of corporate hospitality and gifts is subject to the following general principles:

It must be approved in advance, along with any associated expenses, by a Director if the total value is over £20. If staff are unsure as to the value, they should err on the side of caution and check with their Line Manager or Human Resources.

The procedure that must be followed, in full, is outlined below:

1. It will only be approved where there is a readily identifiable purpose that is based on a genuine need to develop an ethically sound business relationship; and
2. It will not be approved if it is likely that it is part of an attempt to procure the recipient to act improperly or in bad faith.

While it may be acceptable for staff to give or receive corporate gifts and hospitality below the value of £20, it is expected that staff will use their discretion and judgement in considering whether or not the gifts or hospitality below this level fall foul of the principles and rules included within this policy. Generally, hospitality or gifts that are particularly extravagant and extraordinary in their context should raise alarm bells. If staff are unsure as to how to proceed, they must contact Human Resources for guidance.

The following lists are not exhaustive and act as examples only. Employees should check with Human Resources if they have any specific queries as to what may or may not be acceptable.

Examples of gifts or hospitality that are unlikely to be acceptable:

- *Extravagant events such as weekend trips, and particularly trips abroad;*
- *Personal gifts such as jewellery or expensive clothing;*
- *Attendance at particularly opulent and excessive events;*
- *Tickets to sporting events or concerts where the offeror does not intend to attend with the recipient.*

Examples of gifts or hospitality that are likely to be acceptable:

- *Token gifts, such as pens, mouse-mats and calendars;*

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Authorised by: D Gallagher Date: 28/07/20



- *In-house lunches at training or promotional events;*
- *Modest meals offered or received at off-site restaurants;*
- *Tickets to sporting events when taken by the contact in question (i.e. not gifted to be used by staff by themselves);*
- *Tickets to charity dinners and events when the contact in question is also in attendance (i.e. not where a whole table is given to a staff member to be used at his discretion).*

Procedure

1. Before any offers of gifts or hospitality are made or received over £20, staff must seek permission, in writing, from their Line Manager. A corporate hospitality acceptance application and an offering corporate hospitality application are provided at the end of this policy for this purpose;
2. After attendance at corporate hospitality events, you should provide feedback to your Line Manager.
3. Any inadvertent breaches of this policy must be brought to the attention of your Line Manager immediately. Unintentional and innocent breaches of the policy may not result in disciplinary action if they are accounted for promptly, though it is essential that they are brought to light sooner rather than later in order that any resulting problems can be rectified.
4. Employees must report any attempt at bribery made to them or knowledge of such acts by other employees or associated third parties and should use the procedure set out in the Whistleblowing Policy. Staff should be reassured that no person who makes a bona fide report in good faith by following this procedure will be subjected to any detriment as a result of doing so.

Should staff have any queries or concerns in relation to the contents of this policy, they should contact their Line Manager or Human Resources.



CORPORATE HOSPITALITY ACCEPTANCE APPLICATION

Details of hospitality/gift (include any dates):

Estimated value if known:

Offered by (include name, position and organisation):

Declaration

I declare that I have been offered and wish to accept the above hospitality/gift. The details are correct and complete.

I declare that I do not consider that it will compromise or unduly influence in any way my business relationship or dealings with the offeror, their organisation or any associated third parties.

Name:

Department:

Signed:

Date:

APPROVED/REJECTED (delete as appropriate)

Name:

Position:

Signed:

Date:

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OFFERING CORPORATE HOSPITALITY APPLICATION

Details of hospitality/gift (include any dates):

Value:

Offered to (include name, position and organisation):

Declaration

I declare that I would like to offer the above hospitality/gift. The details are correct and complete.

I declare that I do not consider that it will compromise or unduly influence in any way my business relationship or dealings with the offeree, their organisation or any associated third parties.

Name:

Department:

Signed:

Date:

APPROVED/REJECTED (delete as appropriate)

Name:

Position:

Signed:

Date: