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1. Introduction

- 1.1 <<Insert Company name>> recognises that trust and confidence in the product and growth. In order to maintain the confidence of its workers and the confidence that clients, suppliers, and the community have in the Company, it is important that the Company, its employees and its agents behave, and are seen to behave, appropriately and honestly.
- 1.2 This Hospitality and Gifts Policy is intended to:
 - 1.2.1 Protect the reputation of the Company;
 - 1.2.2 Protect employees from allegations of impropriety;
 - 1.2.3 Ensure that all employees are dealt with on an equal basis;
 - 1.2.4 Avoid any potential conflict between employees' private interests and their professional obligations;
 - 1.2.5 Instil a strong culture of integrity in the Company and put in place a robust system of controls to further compliance with the Bribery Act 2010.
- 1.3 Employees are advised that, in addition to anything contained herein, the Company's Code of Conduct, Code of Integrity or propriety of accepting a gift or hospitality offer to which would bring the Company into disrepute. Nothing should be accepted which would bring the Company into disrepute.
- 1.4 This policy applies to all employees and any associated persons as defined in the Bribery Act 2010.

2. Receiving Gifts

- 2.1 Save for gifts of low value (such as promotional pens, calendars and similar items), employees of the Company are not permitted to accept gifts from customers, suppliers or other third parties involved with the Company.
- 2.2 The Company recognises that there may be exceptional instances when an employee is offered a gift which would cause offence or embarrassment. In such instances the gift may be accepted, provided it is subsequently donated to a charity of the Company's choice.
- 2.3 Where practicable, an employee who is offered to accept a gift should first seek approval from <<e.g. their line manager or position>>. If it is not practicable to gain prior approval, the employee should inform <<e.g. their line manager or position>> as soon as possible after receiving the gift.
- 2.4 An accurate record of all gifts offered to the Company or to employees of the Company, including the name of the donor, the nature of the gift, and the date it was received, must be filed in the "Hospitality and Gifts Register" (the "Register"). Any employee who is offered a gift which is not covered by the Register should record, as soon as is reasonable and practicable:

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- 2.4.1 A description
- 2.4.2 An estimation of the value of the hospitality offered;
- 2.4.3 Whether it was accepted or not;
- 2.4.4 If accepted, the date and time of the offer;
- 2.4.5 Whether provided by the Company, and if so, from whom; and
- 2.4.6 Who it is donated to (see paragraph 4.4 below).

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3. Hospitality

3.1 "Corporate Hospitality" means any form of accommodation, entertainment or hospitality provided for an employee of the Company by the Company or any subsidiary of the Company, or extended to the employee solely or significantly due to the employee's position as a representative of the Company. This excludes the classes of hospitality defined at paragraph 3.2 below.

3.2 For the purposes of this policy, the following are not normally considered to be Corporate Hospitality and will not require any approval prior to acceptance:

- 3.2.1 Normal work-related expenses provided during a business visit;
- 3.2.2 Hospitality extended to an employee attending a Company approved external event, provided that such hospitality is not provided to other employees in attendance;
- 3.2.3 [Benefits defined in the Company's Traveller schemes, awarded during travel paid for by the Company];
- 3.2.4 Free seminars or conferences provided that they are free to all employees of the Company.

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3.3 All employees are required to seek approval before accepting any form of Corporate Hospitality. Approval must be sought from the Managing Director where the value of the Corporate Hospitality is likely to be over £500.00 [the Managing Director].

3.4 An accurate record of all Corporate Hospitality offered to the Company or to employees of the Company must be maintained. Any employee offered any form of Corporate Hospitality must record, as soon as is reasonable practicable, the following information:

- 3.4.1 A description of the hospitality offered;
- 3.4.2 An estimation of the value of the hospitality;
- 3.4.3 Whether it was accepted or not;
- 3.4.4 If accepted, the date and time of the offer;
- 3.4.5 From whom the hospitality was provided.

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4. Hospitality and Gifts Register

4.1 The Register shall be maintained by the person responsible for the Register ("the Registrar").

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4.2 [All offers of gifts of value available from <<Intranet>>. The Register shall be countersigned by the Registrar.]

recorded on a Register Entry Form, available for the Register, Company must be signed by the employee and countersigned by the Registrar before being returned to the Registrar.]

OR

[All offers of gifts of value shall be recorded in writing, including all of the information specified in the Register, must be signed and dated by the employee and the Registrar, and the Registrar shall update the Register with the information being given to the Registrar, who shall update the Register.]

recorded in writing, including all of the information specified in the Register, must be signed and dated by the employee and the Registrar, and the Registrar shall update the Register with the information being given to the Registrar, who shall update the Register.]

4.3 The [Register Entry Form] must be completed as soon as is reasonably practicable and submitted to the Registrar within <<5>> working days of the offer of the gift.

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4.4 It is anticipated that the Register shall be updated within <<5>> working days of the date on which the donation was made.

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5. Breach of this Policy

5.1 Compliance with this Policy is essential to the protection of the Company's reputation and that any employee or associate person who is found to have acted in breach of this policy or its principles may be subject to disciplinary action up to and including summary dismissal where the breach amounts to gross misconduct.

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5.2 Any employee or associate person who is found to have bribed or bribed a foreign official (as defined by Section 8 of the Bribery Act 2010) for the purposes of the Bribery Act 2010 will face criminal sanctions. Anyone found guilty of such an offence shall be responsible for bearing any related remedial costs such as legal fees and court costs.

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This policy has been approved & signed by:

Name: <<Insert Name>>

Position: <<Insert Position>>

Date: <<Date>>

Signature:

<<Insert Name of Resources Manager>>

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