# Hos Olicy

#### 1. Introduction

- 1.1 <<Insert Company confidence in the prand growth. In orde workers and the cothat the Company, i appropriately and h</p>
- 1.2 This Hospitality and
  - 1.2.1 Protect the r
  - 1.2.2 Protect emp
  - 1.2.3 Ensure that
  - 1.2.4 Avoid any professional
  - 1.2.5 Instil a stron gift and hos Bribery Act 2
- 1.3 Employees are ad where there is any or hospitality offer t which would bring t
- 1.4 This policy applies by the Bribery Act 2

## 2. Receiving Gifts

- 2.1 Save for gifts of love pens, calendars and are not permitted to parties involved with
- 2.2 The Company rec refusing a gift will instances the gift m the Company's choi
- 2.3 Where practicable approval from <<e.q to gain prior approximanager, or fixed p
- 2.4 An accurate record employees of the "Hospitality and Gif a gift which is not practicable:

any") recognises that trust and essential to its continuing success confidence that clients, suppliers, e in the Company, it is important behave, and are seen to behave,

V:

of impropriety;

re dealt with on an equal basis;

n employees' private interests and

n the Company and put in place a ss to further compliance with the

ding anything contained herein, ility or propriety of accepting a gift offer. Nothing should be accepted to

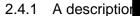
ny associated persons as defined

nere tokens (such as promotional noney, employees of the Company sustomers, suppliers or other third

be exceptional instances when nce or embarrassment. In such sequently donated to a charity of

to accept a gift should first seek position>>. If it is not practicable loyee should inform <<e.g. their sible after receiving the gift.

offers made to the Company or to rties, and must be filed in the er"). Any employee who is offered record, as soon as is reasonable



- 2.4.2 An estimatio
- 2.4.3 Whether it w
- 2.4.4 If accepted,
- 2.4.5 Whether prid
- 2.4.6 Who it is dor

# 3. Hospitality

- 3.1 "Corporate Hospital accommodation, er of the Company by or significantly due excludes the classe
- 3.2 For the purposes of normally considered prior to acceptance:
  - 3.2.1 Normal worl visit;
  - 3.2.2 Hospitality e seminar, co hospitality is
  - 3.2.3 [Benefits de travel paid for
  - 3.2.4 Free semina attendance a
- 3.3 All employees are Corporate Hospitali <<e.g. their line mais likely to be over £
- 3.4 An accurate record Company or to em employee offered a reasonable practica
  - 3.4.1 A description
  - 3.4.2 An estimatio
  - 3.4.3 Whether it w
  - 3.4.4 If accepted,
  - 3.4.5 From whom

# 4. Hospitality and Gifts Reg

4.1 The Register shall ("the Registrar").

offered:

, and if so, from whom; and aph 4.4 below).

of this policy, is any form of spitality provided for an employee s extended to the employee solely esentative of the Company. This sed at paragraph 3.2 below.

ake of clarity, the following are not and will not require any approval

nents provided during a business

attending a Company approved ernal event, provided that such in attendance;

veller schemes, awarded during

provided that they are free to all in by for employees of the Company.

val before accepting any form of m. Approval must be sought from value of the Corporate Hospitality the Managing Director>>].

rporate Hospitality offered to the y for entry on the Register. Any spitality must record, as soon as is

ď;

e hospitality;

þ

hed.

er responsible for the Register>>

4.2 [All offers of gifts of available from << Intranet>>. The Re countersigned by Registrar.1

### OR

[All offers of gifts a the information spe employee and the r shall update the Re

- 4.3 The Register Entry is reasonably practi days of the offer of
- 4.4 It is anticipated th Company or one of relevant entry is ma updated within <<5 made.

#### 5. **Breach of this Policy**

- Compliance with th 5.1 reputation and that is found to have ad subject to disciplina amount to gross mis
- 5.2 Any employee or Bribery Act 2010) f will face criminal Anyone found guilt remedial costs such

This policy has been approved

Name: <<Insert

Position: <<Insert

Date: <<Date>

Signature:

orded on a Register Entry Form, e for the Register, Company be signed by the employee and before being returned to the

> ecorded in writing, including all of must be signed and dated by the being given to the Registrar, who

> d] must be completed as soon as he Registrar within <<5>> working

> where a gift accepted by the been donated by the time that the such cases the Register must be date on which the donation was

> the protection of the Company's mployee or associate person who his policy or its principles may be mary dismissal where the breach

> (as defined by Section 8 of the bribes or bribing a foreign official visions of the Bribery Act 2010. ponsible for bearing any related expenses.

ırces Manager>>

