

## 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 aims 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 of interest between employees' private interests and their professional duties;
  - 1.2.5 Instil a strong culture of integrity within the Company and put in place a robust system of controls to further compliance with the Bribery Act 2015.
- 1.3 Employees are advised not to accept anything containing anything contained herein, where there is any potential conflict of interest or propriety of accepting a gift or hospitality offer that may be perceived as an offer. Nothing should be accepted which would bring the Company into disrepute.
- 1.4 This policy applies to all employees of the Company and any associated persons as defined by the Bribery Act 2015.

## 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 refusing a gift will result in a loss of face or embarrassment. In such instances the gift must be accepted and 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>> 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 must be maintained (see "Hospitality and Gifts Register"). Any employee who is offered a gift which is not accepted should record, as soon as is reasonable and practicable:

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

### 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 extended to the employee solely or significantly due to his/her position as a representative of the Company. This excludes the classes of persons listed at paragraph 3.2 below.
- 3.2 For the purposes of this policy, the following are not considered to be Corporate Hospitality and will not require any approval prior to acceptance:
  - 3.2.1 Normal working hours provided during a business visit;
  - 3.2.2 Hospitality extended to an employee attending a Company approved external event, provided that such employee is in attendance;
  - 3.2.3 [Benefits derived from travel schemes, awarded during travel paid for by the Company];
  - 3.2.4 Free seminars or conferences provided that they are free to all in attendance and are available for employees of the Company.
- 3.3 All employees are required to seek approval before accepting any form of Corporate Hospitality. Approval must be sought from the Managing Director <<e.g. their line manager if the value of the Corporate Hospitality is likely to be over £500>>].
- 3.4 An accurate record of all Corporate Hospitality offered to the Company or to employees must be maintained for entry on the Register. Any employee offered a form of Corporate Hospitality must record, as soon as is reasonably practicable, the following:
  - 3.4.1 A description of the offer;
  - 3.4.2 An estimation of the value of the offer;
  - 3.4.3 Whether it was accepted or not;
  - 3.4.4 If accepted, the date of acceptance;
  - 3.4.5 From whom the offer was made.

### 4. Hospitality and Gifts Register

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

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

OR

[All offers of gifts and services must be recorded in writing, including all of the information specified in the Register, Company must be signed and dated by the employee and the Registrar, who shall update the Register, who

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

4.4 It is anticipated that the Register will be updated where a gift accepted by the Company or one of its employees or associates has been donated by the time that the relevant entry is made. In such cases the Register must be updated within <<5>> working days of the date on which the donation was made.

## 5. Breach of this Policy

5.1 Compliance with this policy is essential to the protection of the Company's reputation and that of its employees. 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 is deemed to be serious.

5.2 Any employee or associate person who is found to have bribed or attempted to bribe (as defined by Section 8 of the Bribery Act 2010) for the benefit of the Company or its employees or associates will face criminal sanctions. Anyone found guilty of such an offence will be responsible for bearing any related remedial costs such as legal fees and fines.

This policy has been approved and signed by the Registrar

Name: <<Insert Name>>

Position: <<Insert Position, e.g. Registrar or Resources Manager>>

Date: <<Date>>

Signature: