

## Anti Bribery/Business Gifts

### What this policy covers

The acceptance of gifts and offers of hospitality can give rise to suspicion of inappropriate conduct, particularly if offered by individuals or businesses that carry out, or are hoping to carry out business for the Company.

This policy establishes the fundamental principles of the giving, accepting and refusing of gifts and hospitality.

### Your responsibilities

#### *Hospitality*

You must not accept offers of hospitality, including attending sporting and social functions, unless these are properly authorised and recorded by the appropriate manager.

Acceptance of hospitality at relevant conferences, courses or events may be appropriate where it is clear that the hospitality is corporate rather than personal and where the Company has given its consent in advance.

All associated benefits, such as accommodation, travel, entertainment, and presents must be refused.

#### *Gifts*

As a general rule, you should not accept gifts from suppliers, clients, customers, contractors or any other person you deal with in your capacity as an employee of the Company.

If the value of the item is negligible, or if the item is presented as a seasonal gift, you should comply with the procedure set out below.

### Procedure

#### *Hospitality*

When hospitality is declined, those making the offer should be politely informed of the Company's policy and procedures for accepting such offers.

#### *Receipt of gifts*

If the gift might constitute a bribe or other inducement, you are required to give the gift to your line manager, who will return it to the donor with a suitable covering letter.

In other instances, where appropriate, the Company will require you to return the gift to the donor with a polite note explaining the Company policy.

In exceptional cases, for example, if the Company decides that the gift was made as a token of the donor's gratitude for a service carried out the Company may allow you to retain the gift.

Promotional gifts that are of trivial value (for example, promotional pens) are exempt from this policy and need not be disclosed.

On seasonal occasions you may receive a number of gifts, for example, chocolates, bottles of wine, and so on. These gifts should be given to your line manager, who will ensure that they are distributed appropriately across the Company.

### *Giving gifts*

Although it is not Company policy to offer gifts, the Company recognises that, on occasion, this may be appropriate, for example, in recognition of exceptional service.

If you wish to propose that the Company presents a gift, you should put a request in writing to your line manager stating:

- who the gift is for
- why it should be given
- the nature of the gift
- the gift's approximate value

If you send gifts that have not been approved in accordance with this procedure, you will not be reimbursed for the cost of the gift. In addition, such action may be treated as a disciplinary offence, which will be dealt with under the Company Disciplinary Procedure.