


HR POLICY GIFTS & HOSPITALITY POLICY	Doc. N°:	HR-GH01	
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1. INTRODUCTION AND PURPOSE

This policy applies to William Hare Group (WHG) and its subsidiary companies. It sets out the ethical and acceptable standards of behaviour which the Board of Directors expects its employees, contractors, consultants and agents to follow in relation to the giving and receiving of business gifts and corporate hospitality and meets WHG's obligations under the Bribery Act 2010.

The purpose of business gifts and corporate hospitality is to create goodwill and sound working relationships, not to develop situations of unfair advantage. WHG recognises that employees may be offered gifts and entertainment from other companies, WHG contacts, suppliers or clients. This Policy sets out WHG's rules on the giving and receiving of business gifts and corporate hospitality, to protect both the individual and WHG.

2. DEFINITIONS

Gifts are any items, cash, awards, prizes, goods or services, offered without expectation of payment or benefit. Gifts also include goods or services offered at a discounted rate, or on terms not available to the general public.

Hospitality is defined as food, drink, accommodation or entertainment (such as cultural or sporting events) provided free of charge, heavily discounted or on terms not generally available to the general public.

3. ACCEPTING GIFTS

The acceptance of gifts from interested business parties could be presented as promoting a conflict of interest that might arguably have compromised the impartiality of decisions that are made.

Employees can accept token gifts given by way of trade marketing for use in the office such as calendars, pens and diaries, or where it is a goodwill gesture such as a bottle of wine or something similar to express thanks, offer congratulations or as a Christmas gift.

However, employees should not accept, cash gifts, gifts which are, extravagant and out of proportion or that have conditions attached to them or any sort of gift where it may be construed as an inducement to favourably influence a business decision. If an employee is offered any of these gifts, they should decline it politely, explaining that WHG does not permit them to accept it, unless to do so would be embarrassing or insulting (for example because the gift is offered in public). The employee should also inform their Line Manager immediately.


If an employee is offered a gift and they are not sure whether they can accept it, the employee should speak to their Line Manager who will decide if the proposed gift is legitimate, proportionate and reasonable and whether it can be accepted or has to be returned to the donor.

4. OFFERING GIFTS

Reciprocal gifting is not encouraged. However, there may be circumstances where the failure to give a gift would give offence. An example would be an official visit by foreign dignitary whose custom would be to give and/or receive a token of friendship or respect. In these circumstances authority from the Chief Executive must be sought. Some employees can offer suitable gifts of a nominal value (no greater than £25) where appropriate. These include items for marketing purposes, such as calendars, pens and diaries and, where the gift is occasional and not regular or repeated and are for purposes such as a goodwill gesture to express thanks or offer congratulations or as a Christmas gift.

If an employee wants to offer more than this gift, the employee should speak to their Line Manager who will decide if the proposed gift is legitimate, proportionate and reasonable.

Employees should never offer, cash gifts, or any sort of gift where it may be construed as an inducement to favourably influence a business decision or the employee knows that the recipient is not allowed to receive it.

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5. HOSPITALITY

Staff must exercise careful judgement when accepting hospitality. When deciding whether to accept hospitality consideration should be given to:

- the reason for accepting the hospitality
- whether acceptance could be satisfactorily perceived by our employees and key stakeholders
- the value / scale of the hospitality (frequent, lavish, prolonged)
- the obligation that acceptance might appear to place on WHG in terms of reciprocal hospitality, business dealings etc
- whether it provides benefits to WHG which outweigh the risk of possible misrepresentation of the hospitality
- the timing of the offer, bearing in mind decisions which WHG may be in the process of taking, affecting the provider of the hospitality, e.g. procurement, bid tenders, award, enforcement of regulations, etc.

Invitations to Annual Conferences or Industry Dinners are acceptable where they are considered an integral element in maintaining and building relationships and it is clear that the hospitality is corporate in nature and not personal. Hospitality which is not acceptable would include invitations to frequent social functions where there is no direct link to official business in a professional capacity.

Modest working lunches are regarded as acceptable practice. Costs should be kept to a minimum and generally should not exceed the subsistence rates set in the expenses policy. Caterers should be booked and approved in accordance with our expenses policy.

6. GIFTS AND HOSPITALITY REGISTER

The HR Manager will maintain a register to record all offers and acceptance of gifts and hospitality. The purpose of the register is to counter any possible accusations or suspicions of breach of the Code of Conduct by employees.

The Gifts and Hospitality Form will be used in all cases. Completed forms will be submitted to the HR Manager who will file the relevant details and update the gifts and hospitality register. Where a gift or hospitality is accepted, the entry in the register must be supported by written confirmation of approval by the relevant Line Manager & Board Member.

7. ROLES AND RESPONSIBILITIES

Employees should:

- should be aware of the Code of Conduct, and any updates that are issued
- comply with this policy
- consult with their Line Manager if in doubt as to the application of this policy
- inform their Line Manager if they suspect they have been offered an expensive gift or significant hospitality with corrupt intent.

Line Managers/Heads of Department should:


- support officers in complying with this policy
- carefully consider and approve the acceptance and provision of gifts and hospitality in line with this policy
- seek advice from their Board Member when necessary, on the application of this policy
- advise and remind their team members to complete the gifts and hospitality register

Board Members should:

- advise and remind staff to complete the register for gifts and hospitality
- carefully consider and approve the acceptance and provision of gifts and hospitality in line with the policy

HR Manager will:

- ensure that all employees are made aware of their roles and responsibilities in relation to receiving and providing gifts and hospitality
- maintain an annual register to record all offers and acceptance of gifts and hospitality
- file all 'Gifts and Hospitality' forms

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Amendment Record

Version No.	Date	Short Description Of Amendment	Amended By
1	07/2022	Transfer to new template and general amends. Addition of 2 – Definition, 5-Hospitality, 6-Gifts and Hospitality Register, 7-Roles and Responsibilities	KB
2	01/2024	Annual review, no change required	KB
3			
4			
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Susan Hodgkiss

Susan Hodgkiss
 Chief Executive Officer
 for and on behalf of **William Hare Group Limited**
 Dated: January 2024