

Gifts and corporate hospitality policy

The purpose of this policy is to set out our rules on the giving and receiving of gifts and corporate hospitality in order to protect our reputation and ensure that we operate both lawfully and ethically.

This policy applies to all employees.

Offering gifts

We support the practice of offering modest non-cash gifts to business partners where appropriate for marketing purposes or, as long as the gift is occasional and not regular or repeated, other purposes such as expressing thanks or making a goodwill gesture. For example, we may offer promotional material such as [pens, calendars etc] for marketing purposes or send a token gift to a business partner as a Christmas gift.

You should never offer:

- cash gifts;
- any sort of gift where the intention is to influence the recipient's judgment;
- any sort of gift where you know that the recipient is not allowed to receive it.

Accepting gifts

You are allowed to accept token gifts from business partners or potential business partners where this constitutes legitimate and reasonable marketing or where it is a legitimate goodwill gesture. For example, you can accept promotional items such as desk calendars or pens or occasional gestures such as a bunch of flowers from a customer to express thanks or offer congratulations.

You should never accept:

- cash gifts; or
- gifts which are extravagant and out of proportion with the value of the business relationship or;
- repeated/regular gifts from the same donor; or
- any sort of gift where your judgment might reasonably be thought to be at risk of influence as a result of the gift (for example, a gift from a potential business partner shortly before you make a decision over whether or not to award them a contract); or
- any sort of gift which might reasonably bring the business into disrepute or be contrary to terms or the spirit of our equal opportunities/dignity at work policy, for example a pin-up calendar.

Be aware that a 'gift' includes food, drink and other corporate hospitality if the host is not present. For example, if you are invited to attend a test match at Lords by one of our suppliers but the supplier will not be present then the tickets are a gift.

If you are offered a gift in circumstances which make you concerned or uncomfortable then you should raise this with your line manager. It is our policy and your responsibility to act ethically at all times.

If any unauthorised gift is offered to you then you should decline it politely explaining that our policy does not permit you to accept it, unless to do so would be embarrassing or insulting (for example because the gift is offered in public) in which case you should accept the gift and then refer the situation to your line manager. The company is likely to write to the donor of the gift explaining our policy and returning the item.

Gifts and overseas travel

If you are travelling overseas on business to an area where gifts are an important part of business culture then you will be allowed and expected to participate in gift giving and receiving but this still needs to be proportionate and reasonable from a UK perspective.

Corporate hospitality and entertainment

Our policy is to participate in corporate hospitality and entertainment where this will promote good relationships with our business partners.

For example, one per year annual event at Chester races where major clients are invited to promote good working business relationships, In addition, working lunches with business partners are appropriate.

However, corporate hospitality and entertainment, including attendance at dinners or sporting events, should not be offered or accepted if:

- It is lavish and extravagant; or
- it is on a scale which is disproportionate to the legitimate business value of the relationship.
- you are offering it with the intention of influencing the recipient's judgment or when you know they are not permitted to accept it.
- you are offered it in circumstances when acceptance would influence your business judgment or put you in a difficult position, for example [being offered Wimbledon tickets by a supplier shortly before their contract came up for renewal].
- if it might reasonably bring the business into disrepute or contravene the terms or the spirit of our equal opportunities/dignity at work policy, for example a post-meal visit to a 'gentleman's club'.

If you are unsure as to whether a particular invitation is appropriate, you should seek guidance from your line manager.