Gifts and Hospitality Policy

Compliance Policy | Global

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Replace all references to “the Company” with your organisation’s name.

Document Control

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Contents

1. Purpose

This Policy sets out the Company's requirements for giving and receiving gifts, entertainment and hospitality in connection with its business. Modest gifts and hospitality can be a legitimate part of building commercial relationships; they are also a recognised channel for bribery and improper influence, and are treated as such by international anti-corruption instruments and by anti-bribery statutes in every jurisdiction in which the Company may operate. This Policy establishes the boundaries, approval thresholds, recording obligations and prohibitions that keep such exchanges within the Company's conduct risk appetite and outside the reach of the bribery and corruption offences applicable to the Company and its people.

The Policy is designed to achieve three outcomes: no gift or hospitality is given or received with the intent, or the reasonable appearance, of influencing a decision; every declarable item is transparently recorded in the Gifts and Hospitality Register; and elevated-risk situations, in particular any dealing with a public official or during a tender or procurement window, are subject to prior Compliance scrutiny.

This Policy is approved by the Board of Directors, is owned by the Chief Compliance Officer, and forms part of the Company's compliance and conduct risk framework alongside the Anti-Bribery and Corruption Policy, the Conflicts of Interest Management Policy and the Code of Conduct. It implements the gifts, hospitality and donations control required by ISO 37001 and forms part of the Company's adequate procedures to prevent bribery by staff and associated persons.

2. Scope

This Policy applies to all directors, officers, employees (permanent, part-time and casual), secondees, contractors and consultants of the Company and its subsidiaries (together, "staff"), wherever located, and to any associated person acting on the Company's behalf. It applies to gifts and hospitality given or received in any form and through any channel, including items directed to a staff member's family members, associates or nominated charities where the item is connected to the staff member's role at the Company.

The Policy covers both directions of exchange: items offered to staff by customers, suppliers, intermediaries, counterparties or any other third party, and items the Company or its staff provide to third parties. Third-party service providers and other associated persons acting for the Company must be contractually required to observe standards consistent with this Policy, in line with the Company's third-party risk management arrangements.

This Policy does not apply to: exchanges between staff members in a purely personal capacity funded privately (which are governed by the Code of Conduct); remuneration and benefits provided by the Company as employer; or sponsorships and charitable donations made by the Company, which are governed by Donations to Community Groups and Charitable Causes but must never be used to circumvent this Policy.

2.1 Jurisdictional application

This Policy states international best practice drawn from the instruments listed in the Regulatory Framework section. The Company must map the requirements of this Policy to the anti-bribery, anti-corruption, tax and public-sector integrity laws of each jurisdiction in which it operates, including any statutory gift limits applicable to public officials, and record that mapping in its compliance obligations register. Where the law of an operating jurisdiction imposes a stricter requirement than this Policy, local law prevails; where this Policy is stricter than local law, this Policy prevails.

3. Definitions

Term	Definition
Gift	Any item, benefit, service, discount, prize, favour, loyalty upgrade or other thing of value given or received in connection with a person's role at the Company for which the recipient does not pay fair market value, other than remuneration paid by the Company or items exchanged in a purely personal capacity.
Hospitality	The provision or receipt of food, drink, accommodation, travel or entertainment in a business context, including meals, functions, sporting and cultural events, and invitations to conferences or corporate boxes.
Entertainment	A subset of hospitality involving attendance at an event whose primary character is recreational, such as a sporting fixture, concert or theatre performance, whether or not business is discussed.
Cash Equivalent	Any instrument readily convertible to cash or usable as cash, including gift cards, prepaid debit cards, vouchers, cryptocurrency and other virtual assets, securities, lottery tickets, loans and reimbursements of personal expenses.
Public Official	Any person holding a legislative, administrative or judicial position, whether appointed or elected; any employee, officer, agent or contractor of a government, government agency, regulator, central bank, state-owned or state-controlled enterprise or public

	international organisation; any official of a political party; and any candidate for public office, in any jurisdiction.
Foreign Public Official	A Public Official of a jurisdiction other than the one in which the relevant conduct occurs or in which the relevant Company entity is established, consistent with the definition used in the OECD Anti-Bribery Convention, including employees of foreign state-owned or state-controlled enterprises and officials of public international organisations.
Source	The individual, entity or corporate group from which a gift or hospitality originates, or to which it is provided. All related entities within a corporate group, and all individuals acting for that group, are treated as a single source for aggregation purposes.
Tender or Procurement Window	The period commencing when the Company issues, receives or begins preparing a request for tender, request for proposal, contract negotiation or contract renewal involving a third party, and ending when the contract is executed or the process is formally abandoned.
Gifts and Hospitality Register	The central electronic register maintained by the Compliance function recording all declarable gifts, hospitality, donations and sponsorships given or received, together with their value, the counterparty, the approver, the rationale and all approval decisions.
Pre-Approval	Documented approval obtained through the Gifts and Hospitality Register before a gift or hospitality is given, accepted or committed to.
Aggregation	The requirement to sum the value of all gifts and hospitality given to or received from the same source over a rolling [12-month] period when applying the thresholds in this Policy.
Facilitation Payment	A minor, unofficial payment made to a public official to secure or expedite a routine governmental action to which the payer is already entitled. Facilitation payments are prohibited by the Company in all circumstances, consistent with ISO 37001 and the OECD Anti-Bribery Recommendation, even where local law

	provides an exception or defence.
Associated Person	Any person or entity that performs services for or on behalf of the Company, including agents, intermediaries, introducers, distributors, consultants, contractors and joint-venture partners, whose conduct may expose the Company to bribery liability.
Attestation	A formal written confirmation by an accountable individual or staff member that, to the best of their knowledge after due enquiry, stated obligations, controls or requirements have been met for their area of responsibility during the relevant period, or that a document has been read and understood or remains current, together with disclosure of any known exceptions.
Conflict of Interest	A situation in which a person's private interests, relationships, financial or family interests, or duties owed to another person or entity, could improperly influence, or could reasonably be perceived to influence, the performance of their duties to the Company or its customers. Conflicts may be actual, potential or perceived.
Senior Manager	A person, other than a director, who holds senior executive responsibility for the Company or for a significant business unit or control function, including any person designated, registered or approved as such under the senior manager accountability regime applicable in the Company's operating jurisdiction(s) or, where no such regime applies, under the Company's own accountability arrangements.

4. Regulatory Framework

The key legislation, regulations and standards relevant to this document include (as amended from time to time):

Instrument / Standard	Relevance
United Nations Convention against Corruption (UNCAC, 2003)	The global baseline instrument criminalising bribery of national and foreign public officials and private-sector bribery; this Policy's public-official regime and prohibitions are calibrated to keep

End of preview

This is a preview extract. The complete document continues beyond the pages shown here.

The full document is supplied as a single, fully editable Microsoft Word (.docx) file immediately after purchase — including every remaining section, the definitions, the regulatory framework references and all appendices and templates.

Bracketed prompts such as [30 days] mark the points where your own thresholds, committee names and local regulatory references are inserted.