



Gifts and Hospitality Policy

Overall Statement of Principles

The Ogilvie Group runs its business with integrity and as such the acceptance of gifts from third parties is not permitted, with the exception of gifts of a very low monetary value. The acceptance of any form of corporate hospitality requires prior approval by the member of staff's head of department.

Under the Bribery Act 2010 it is an offence to offer or accept an inducement to act improperly. Hence, it is essential that a record is kept of all gifts and hospitality that are given and received. Under no circumstances must any gift or hospitality be offered as an inducement to act improperly. If an employee is offered a gift or hospitality and is asked to carry out an improper act in return this employee must report the issue to his/her line manager immediately.



Employees can only accept and keep gifts paid for by third parties if they are of a low monetary value, such as pens, diaries and other promotional items. At Christmas, employees may accept gifts of items such as foodstuffs, bottles of wine, spirits or beer. These gifts should be shared out among all members of staff.

Accepting and keeping all other gifts is generally not permitted, and is never allowed as an inducement for acting improperly. Employees must not accept/keep any gifts offered during a tendering/procurement process under any circumstances. Where refusing a gift would cause a major offense (such as from religious leaders), the issue must be referred to the Group H R Manager who will advise accordingly.

All gifts must be notified to the HR Department for recording.

Acceptance of corporate hospitality must be transparent and members of staff must always receive approval from their head of department prior to accepting corporate hospitality. The following areas are exempt:

- ▶ business and travel expenses incurred while attending events / conferences / seminars, etc sponsored or supported by third parties
- ▶ normal business lunches and meals with the exception of lunches / meals offered as part of a tendering / procurement exercise
- ▶ gifts provided by loyalty schemes or similar arrangements.

Advice on situations outside the precise terms of this Policy is available from the HR Department.

All offers of corporate hospitality must be notified to the HR Department for recording.

By order of the Board
Ogilvie Group

