

Document Ref	QP055	Document Title	Gifts & Hospitality Policy			
Owning Department	Finance	Effective Date	25-Mar-19	Review Date	25-Mar-21	

1. Purpose

Corporate hospitality is an important part of our business relationships and can provide valuable opportunities for developing an understanding of a client or partner's business, as well as gaining the insight necessary for an effective and successful working relationship and promotional opportunities.

However, London & Partners, our staff, our partners, clients and our suppliers must avoid any risk of allegations of bribery under the UK's Bribery Act 2010 which has very serious criminal and regulatory consequences.

This document provides policy on how to give or receive reasonable gifts and entertainment to and from (potential) partners, clients and contacts as well as (prospective) suppliers.

2. Scope

This document applies to all employees of London & Partners and Directors of London & Partners and its subsidiary companies.

3. Responsibilities

The Board have reviewed and approved this policy which was developed by the CEO, Managing Director, Operations & Governance and the Management Committee. The policy will be regularly reviewed by the Managing Director, Operations & Governance or delegate. Any major changes will be shared with the London & Partners Board for approval before the document is issued.

Each individual is responsible for adhering to this policy and must consult as necessary with their (Managing) Director. They shall be responsible in the first instance for determining what is reasonable in terms of the frequency and nature of entertainment for an individual person (within the boundaries of the overall limits provided below). There are certain circumstances, detailed in this policy, where pre-approval is required by the CEO or the Managing Director, Operations & Governance.

3.1. Enforcement

Failure to adhere to this Policy has:

- **Disciplinary consequences:**
Where entertainment or gifts are provided, or accepted which breach this policy, the company may take such disciplinary action as appropriate (up-to and including dismissal).
- **Financial consequences:**
Where entertainment or gifts are provided in breach of this policy, the company may refuse any amounts claimed through expenses, and shall seek a refund from the individual involved.

3.2. Reporting Breaches

If you have any concerns or suspicions about non-compliance with this Policy, you must report the matter to the Managing Director, Operations & Governance.

Alternatively, matters can be reported through the company's HR Whistle-Blowing procedure.

4. Provisions of Gifts & Hospitality

Entertainment provided by London & Partners shall be appropriate and reasonable in terms of its cost, frequency and nature. Normal entertainment occurs during relationship building with clients and contacts, at events and exhibitions, during fam trips, press trips, sales missions and meetings in London & Partners offices.

The guidelines on expenditure detailed in the Travel and Expenses policy must be followed.

- Items below £50 in total (e.g. catch up meeting over coffee) do not require prior approval
- Items over this level up to £250 in total must be approved in advance in writing by a senior leadership team member responsible for the Directorate providing the entertainment
- Items £250 - £500 must be approved in advance in writing by the (Managing) Director
- Items over £500 must be approved in advance in writing by the CEO or the Managing Director, Operations & Governance.

When considering the appropriateness of any entertainment you must consider what position the individual holds as a (potential) partner, client contact or (prospective) supplier) and whether they would be unduly influenced as a result of entertainment. Be particularly careful if there is an event bid or supply contract tender underway as to whether it is appropriate for the recipient to receive the hospitality.

All such expenses (including those below £50) must be coded as Business entertainment for accounts and review purposes.

4.1. Dining

When dining with partners, clients, contacts, prospective clients or suppliers, London & Partners staff and associated persons will exercise judgement on what is appropriate (for that relationship). It is accepted that there are circumstances where it is appropriate for London & Partners to pay for partners and others however wherever possible arrangements should be made so that this is not the case.

Overly lavish and extravagant dining with clients shall be avoided; a cost of £25-50 (excluding VAT) per head is generally the upper limit of what is acceptable although advance approval from the CEO or the Managing Director, Operations & Governance must be sought for special cases above this amount.

4.2. Flights, Travel & Transportation

In certain circumstances, entertainment may require the (potential) partner, client, contact or (prospective) supplier to travel (rail, car or flights), either in the UK and / or abroad.

Reasonable local car hire and some taxi costs can be incurred by London & Partners when arranging events however cars should not generally be booked to transport groups for a full day. Non-London & Partners individuals will be responsible for their own rail and flight travel

costs to and from London and whilst in London or these should be arranged in advance and paid for by a partner, and London & Partners shall not pay for/reimburse any of these costs except in exceptional circumstances. In exceptional circumstances where it is justified for London & Partners to incur these expenses prior approval shall be given by the relevant (Managing) Director.

For the avoidance of doubt, this does not prohibit the sharing of taxis where appropriate to do so. The provision of other communal transport such as coaches must be approved in advance by the relevant budget approver.

4.3. Sponsored Events

In certain circumstances the cost of an event, part of an event or travel expenses to or from an event may be paid for by a third party although the organisation of the event is performed by London & Partners. In this situation the organiser should consider the nature and appropriateness of the event even though London & Partners funds are not being used as the company will still be associated with the event by others

4.4. Gifts

Gifts to (potential) partners, clients, contacts and (prospective) suppliers are not generally permitted other than those of a token nature (e.g. a London & Partners branded item). There is a real danger of suggestions of bribery where a valuable gift is given. In the few countries where it is customary and expected to provide gifts, London & Partners staff and associated persons shall obtain approval from the relevant senior leadership team member before making the gift. Any gifts shall comply with policy standards regarding value.

The cost of the gift(s) individually or cumulatively should not exceed £50, excluding VAT without prior approval from a member of the Management Committee.

Exceptions to the Policy:

Small presents for invited speakers are not defined as 'gifts' for the purposes of this policy. Nonetheless, care must be taken as to the appropriateness of such gifts and they should not exceed £50 (excluding VAT) without approval from a member of the Management Committee.

Donations and charitable giving, such as donating prizes to sponsored charities is also permitted when an individual/company chooses to waive their fee but such donations and the recipient should typically be at London & Partners' choosing (not directed by a non-London & Partners person) and advance approval from the CEO or Managing Director, Operations & Governance should be obtained.

Prizes for promotional competitions (e.g. web surveys), or as a part of a marketing campaign activity are also acceptable. However prior approval should be sought from the relevant (Managing) Director.

4.5. Recording Policy Exceptions

Where a member of the Management Committee approve an exception to this policy, the person responsible for the expense must keep a record of:

- the details (recipient, amount, type) of the gift or entertainment
- the reason for the approval
- any other conditions pertaining to the approval. A copy of this should be attached to the invoice, credit card statement or expense claim as relevant.

5. Receipts of Gifts & Hospitality

5.1. General Caution

Treat with caution any offer or gift, favour or hospitality that is made to you. Your personal reputation and that of London & Partners can be seriously jeopardised if you inappropriately accept gifts or hospitality. Be aware of the wider situation in which the offer is made. For example, staff should consider whether the donor is in, or may be seeking to enter into a commercial relationship with London & Partners. The receipt of gifts, benefits and hospitality can create conflicts of interest and may give rise to an adverse inference as to the integrity of either the donor or the recipient. London & Partners recognises that a refusal may cause embarrassment or offence but this must be balanced with your other responsibilities.

5.2. Guidelines and Principles

Gifts and business entertainment offered to London & Partners staff and associated persons must meet the same general criteria in terms of reasonableness and appropriateness. You should also ensure that you are comfortable that any gifts or entertainment received comply with the (potential) client's or (prospective) supplier's own policies. Nothing should be accepted which is or could give the impression of being a bribe or inducement.

In deciding whether it is appropriate to accept any gift or hospitality you must apply the following principles:

- Do not accept a gift or hospitality of significant value or whose value is excessive in the circumstances; do not accept a gift or hospitality if you believe it will put you under any obligation to the provider as a consequence; do not solicit any gift or hospitality and avoid giving any perception of so doing.
- You must be clear as to the value of the gift / hospitality at the time that you agree to accept it; where the actual value of a gift or hospitality is not known or is not reasonably obtainable, you must decide how much a person could reasonably be expected to pay for it at a commercial rate;
- Extra vigilance should be applied when considering accepting a gift or hospitality from parties involved in a competitive tendering or other procurement process with which London & Partners is involved or could be perceived to be involved.
- You should declare receipt of any gift or hospitality that an ordinary member of the public might reasonably deem to be significant (e.g. the identity of the provider or the wider context in which the item was provided), regardless of its formal cash value.

5.3. Gifts & Hospitality to be Declared

Gifts and hospitality with a value of £50 or more must be reported on the gifts and entertainment register. If it is difficult to estimate the value, report the item anyway to avoid any doubt.

Details of items should be emailed to giftsandhospitality@londonandpartners.com providing the date, nature of gift or entertainment received and approximate value (estimate if necessary) as well as the business rationale. If you are not sure or it is difficult to estimate the value, report the item anyway to avoid any doubt.

You must forward the details within 28 days of receiving the gift or hospitality.

The register will be reviewed by the Management Committee on a quarterly basis and by the Audit and Finance Committee annually. As part of London & Partners Transparency Policy, entries relating to members of the Board and or Senior Leadership Team will be published on londonandpartners.com.

Directors and all staff will be asked to declare annually that all declarations have been properly made or that no such declarations have been necessary.

You are not required to declare gifts and / or hospitality that have been offered but declined. However, you should report to your (Managing) Director or the CEO in the case of (Managing) Directors, any offers you have declined that could be perceived as significant or controversial. The key criteria would be whether the offer was unusual and / or frequency and persistence of the offer. Such offers would not be published on the gifts and hospitality register; reporting of any such offers would, however, allow action to be taken corporately.

5.4. Gifts Accepted on Behalf of London & Partners

On occasion gifts may be given to London & Partners that you accept formally on the company's behalf and are retained by the company and not by you personally. These gifts may be from representatives of other cities and nations and items commemorating an event or relationship. These gifts must be registered in the normal way.

6. Change History

Threshold limits have been updated.

Document has been transferred to a new template.

The policy is explicit that it refers to Board Directors as well as employees (19-Mar-19)

The policy clarifies that gifts and hospitality received by the Board and SLT will be published (19-Mar-19)

7. Training Requirements

All staff must read and understand the changes

8. Appendices

None