



HOSPITALITY POLICY

The Company acknowledges that from time to time employees will be offered corporate hospitality from suppliers or potential suppliers. The Company is keen to foster good working relationships with its suppliers and believes that in moderation hospitality assists in achieving this objective.

Employees must use their judgement and discretion in deciding whether to accept corporate hospitality. The guidelines below will help you decide whether to accept an offer.

- It is Company policy that you must not offer, give, solicit or accept an inducement.
- Hospitality should never be accepted if you believe the objectivity of your decision making could be impaired as a result of the hospitality.
- Hospitality must never be accepted where the supplier is not present. This could be perceived as bribery. Examples of hospitality not to be accepted are theatre tickets for yourself and family, where the supplier is not accompanying you.
- If you incur travel or accommodation expenses in respect of any hospitality these must be authorised and agreed in advance by your line manager. These expenses should be kept to a minimum.
- Travel and accommodation costs in respect of your spouse will not be met by the Company without the prior approval of a director.
- Hospitality accepted in Company time must not be excessive, or interfere with your day-to-day responsibilities.
- Business lunches need not be disclosed.
- Hospitality should not be excessive in terms of perceived value in relation to the underlying business relationship.
- Examples of reasonable hospitality are: - theatre, sporting events (participating or spectator), special dinners (i.e. awards). As a general rule accommodation to be paid for by the host should be authorised by your line manager in advance.

You should keep a record of all corporate hospitality accepted as you may, from time to time, be asked by Personnel to provide the record for audit or other purposes.

If you are in any doubt concerning any hospitality offer, you should consult your Line Manager, the Personnel Manager or a Director as appropriate.

There is a separate policy in respect of receiving gifts from suppliers.