

Gifts & Hospitality Policy

1 Introduction

1.1 Background

The Group has a **Code of Ethics** and **Anti-Bribery Policy** that emphasises our zero tolerance of bribery and our commitment to conducting business in accordance with the highest standards of business and personal ethics.

1.2 Purpose

There is a risk that the offer or receipt of gifts or hospitality may improperly affect a business decision or transaction and therefore this **Gifts & Hospitality Policy**, which forms part of the Anti-Bribery Policy, provides you with guidance on:

- a) what constitutes an appropriate gift or hospitality;
- b) when they should be avoided; and
- c) when they can be accepted subject to prior notification and approval

Having regard to an employee's role or responsibility, they will be informed of this **Gifts & Hospitality Policy** as part of the Group's induction process and asked to confirm that they have read and understood it.

2 Gifts and Hospitality

2.1 Assessing the appropriateness of gifts and hospitality

Generally, the giving and receiving of gifts and hospitality is a normal way of developing and maintaining business relationships with suppliers, contractors and others. Any gifts or hospitality should reflect a desire to cement good relations and show appreciation, without the recipient being under the impression that they are under an obligation to confer any business advantage. Gifts and hospitality should be modest and only ever an infrequent or occasional activity.

It is important you ensure your personal relationships with external contacts do not influence the decisions you make on behalf of Unite and you ensure the appropriateness of any gifts or hospitality. Deciding whether it is appropriate is ultimately a matter of judgement.

2.2 Gifts over £50 and Hospitality over £250/£500

The giving or receiving of gifts or hospitality above certain levels are only permitted if there is a clear business justification and notified/approved as follows:

Gifts over £50 are only allowed in exceptional circumstances and require **approval from your line manager**. You are also required to **notify** the **Company Secretarial team** using the [Gift Notification Form](#)

Hospitality over £250 (including travel, accommodation etc.) requires **prior written approval from your line manager**. You are also required to **notify** the **Company Secretarial team** using the [Hospitality Notification Form](#)

Hospitality over £500 requires, in addition to line manager approval, **prior written approval from a member of the Executive**. You are also required to **notify** the **Company Secretarial team** using the [Hospitality Notification Form](#)

You cannot give or receive any gift or hospitality in the **3-month period** before or during a **tender, contract renewal or similar process**. The Procurement team will be notified of all gifts and hospitality.

2.3 Prohibited Gifts and Hospitality

The following types of gifts or hospitality are prohibited and therefore cannot be given or accepted. **If in doubt, please discuss with the Company Secretarial team.**

Gifts or hospitality that may give rise to a conflict of interest

- Gifts or hospitality that are given in the expectation that something will be given in return
- Gifts or hospitality that are given by a potential or current supplier during a tender or similar process. **Please check with the Procurement team if you are unsure.**
- Free or discounted services provided to you by a supplier, where the discount is given because you work for Unite
- Gifts or hospitality that incentivise individual colleagues to favour the products or services of a particular supplier

Gifts or hospitality that may be considered a bribe

- Gifts of cash or cash equivalent, such as vouchers
- Gifts or hospitality to public officials that are intended to influence their decisions

Gifts or hospitality that may harm the reputation of Unite

- Gifts or entertainment that are indecent, offensive or pornographic in nature
- Requests to suppliers to provide large quantities of free products for Unite events or free tickets for events that are sponsored by that supplier

Political, charitable or not for profit organisation donations

- Directors and employees of Unite are not permitted, directly or indirectly, to make an offer of, or make a donation to any political, charitable or not for profit organisation in the course of their employment as a way of obtaining an advantage in a business transaction.

3 Raising a Concern

The Group maintains an independent **Whistleblowing** channel through which employees may report (anonymously, if they wish) any concerns they may have regarding suspected illegal or improper conduct, including, but not limited to bribery.

Employees are encouraged to raise concerns about any issue, including any suspicions of bribery or corruption, at the earliest possible stage.

4 Breaches of this Policy

Any employee who breaches this policy will face disciplinary action, which could result in dismissal for gross misconduct.

Bribery is a criminal offence. Individuals found guilty can be punished by up to ten years' imprisonment and/or a fine. As an employer if we fail to prevent bribery, we can face an unlimited fine and damage to our reputation. We take our legal responsibilities very seriously.