

# Gifts and Hospitality Policy & Guidelines

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### 1. About this Policy

The purpose of the Gifts and Hospitality Policy is to set appropriate guidelines for the acceptance and provision of gifts and hospitality by Avant Homes' Group employees

We recognise that giving and accepting gifts can be part of building normal business relationships. We expect high standards of conduct from everyone at the Avant Group and this includes being open and transparent about gifts and hospitality.

In certain circumstances some gifts and hospitality might be regarded as creating improper influence and conflicts of interest. They might be viewed as bribes that could damage Avant Homes' reputation or even break the law. There may be nothing improper regarding the gift or hospitality, but they can sometimes give rise to the suspicion of inappropriate conduct, particularly if offered by individuals or companies that are undertaking, or have an expectation of undertaking business with the Avant Group.

This policy applies to all employees at all levels within the business, including senior managers, officers, directors, employees (whether permanent, fixed-term or temporary), consultants, contractors, trainees, casual workers and agency staff.

It also encompasses the taking of gifts or hospitality by family members of employees.

This policy does not prohibit normal and appropriate hospitality (given and received) to or from third parties. The employee should always consider the intention behind the offer of a gift and hospitality before it is accepted. They should always consider how it might be perceived by others. It is essential that they do not influence, nor could be perceived as influencing, business decision making.

It is the responsibility of each employee to consider whether the giving and receiving of a gift or hospitality is appropriate and take individual responsibility for ensuring actions comply with Avant Group policy and do not call into question the honesty, impartiality or reputation of the Avant Group.

Gifts or hospitality generally include services, entertainment, transportation, money, loans, personal items, or any other item of more than nominal value.

You should never accept gifts or favours that are inconsistent with the law or ethical business practices.

## **2. Guidance on acceptable level of gifts and hospitality**

Guidance on appropriate levels of gifts and hospitality, and the level of authorisation that is required before such gifts and hospitality can be accepted, is set out in the checklist at Appendix A.

This is not an exhaustive list and employees are primarily responsible for deciding whether or not it is appropriate, in the circumstances, to accept a gift or offer of hospitality.

### **3. Obtaining approval**

Employees should refer to the attached checklist to ascertain the appropriate level of approval that is required before a gift or hospitality is accepted.

If approval is required before the gift or hospitality can be accepted, the employee will complete the Gift / Hospitality form attached at Appendix B and obtain the appropriate approvals before accepting the gift / hospitality.

Once the Gift / Hospitality form has been completed, a copy should be forwarded to the Group HR for recording purposes.

If there is any doubt about accepting a gift or hospitality, the employee should discuss this with their line manager or Managing Director prior to accepting a gift or hospitality.

Failure to comply with our Policy may result in disciplinary action under the Company's formal disciplinary policy. Serious misconduct and/or behaviour which is deemed to have called into question an individual's and/or Avant's honesty, impartiality or reputation may result in dismissal, including summary dismissal under the Company's formal disciplinary policy. The Company also reserve the right to pursue a criminal prosecution and/or civil action if it considers this to be reasonable and/or appropriate.

### **4. Examples of unacceptable behaviour**

It is not acceptable for employees or members of their families (or anyone on their behalf) to:

- Give or offer a payment, gift or hospitality with the expectation or hope that a business advantage will be received, or to reward a business advantage already given.
- Give or offer, a payment, gift or hospitality to a local authority or other government official, agent or representative to "facilitate" or expedite a routine procedure.
- Accept a payment, gift or hospitality from a third party that you know or suspect is offered with the expectation that it will obtain a business advantage for them.

### **5. Record keeping**

All employees must declare and keep a written record of all hospitality or gifts accepted or offered, which will be subject to review in line with the criteria detailed at Appendix A, by

1. Completing the Gift / Hospitality Form at Appendix B

2. Obtaining the requisite approvals
3. Submitting the completed form to the Group HR Department

If you are offered a gift or hospitality which you declined but which you consider was offered to you with the expectation of securing an advantage you should notify your line manager or Managing Director. It is not necessary to record other offers of gifts or hospitality not offered to you to achieve a benefit.

You must ensure that all expenses claims relating to hospitality, gifts or expenses incurred to third parties are submitted in accordance with the Group's expenses policy and specifically record the reason for the expenditure.

## 6. How to raise a concern

The prevention, detection and reporting of corruption are the responsibility of all employees and all employees are required to avoid any activity that might lead to, or suggest, a breach of this policy.

Where an employee believes or suspects that a conflict with this policy has occurred or may occur in the future then they should notify their line manager or, if for any reason they feel unable to do so, the Group HR Director. For example, if a supplier or potential supplier offers you something to gain a business advantage with us or indicates to you that a gift or payment is required to secure their business.

## RESPONSIBILITIES

TASK	RESPONSIBILITY
Obtaining approval if required	All employees
Completion of gift/hospitality form	All employees
Approval	As per Appendix A
Submission of form to Group HR	All employees

## Appendices

**Appendix A : Offer of Hospitality checklist**

**Appendix B : Gift / Hospitality form**



## Appendix A

### Offer of Hospitality Checklist

Type of Gift/Hospitality	Approval Required
1. Modest conventional hospitality (e.g. working lunch)	No
2. Seasonal gifts of low value, such as calendars, diaries and pens or a bottle of wine at Christmas to the value of no more than £25	No
3. Formal lunch or dinner by prior invitation	Prior approval required from Line Manager
4. Commemorative or similar occasion organised by contractor, consultant or supplier (e.g. to celebrate an anniversary, opening or handover)	Prior approval required from Managing Director
5. Trade promotion on company's premises with meals or drinks	Prior approval required from Managing Director
6. Annual Dinner of Professional Institute or Association	Prior approval required from Managing Director
7. Any gift valued at more than £25 up to £100.	Prior approval required from Managing Director
8. Any gift valued at over £100	Prior approval required from Regional Chairman or CFO (Group colleagues)
9. Hospitality for a team	Prior approval required from Managing Director
10. Overseas visits to inspect manufacturers' products/premises	Prior approval required from Group Board
11. Leisure Events / Sporting Events / Complimentary Tickets or any other hospitality valued over £25 up to £100	Prior approval required from Managing Director
12. Leisure Events / Sporting Events / Complimentary Tickets or any other hospitality valued over £100 up to £500	Prior approval required from Regional Chairman or CFO (Group colleagues)
13. Leisure Events / Sporting Events / Complimentary Tickets or any other hospitality valued at £500 or more	Prior approval required from the Regional Chairman or CFO (Group colleagues)
Examples where hospitality / gifts may not be accepted in any circumstances	Money in lieu of hospitality, leisure event, gift, etc Any form of lump sum payment, commission, fees Any personal loan The supply of discounted/free materials, products and/or services

**APPENDIX B**  
**Gift / Hospitality Form**

Name:	
Region:	
Job Title:	
Date of event or gift offered:	
Who made the offer:	
Description of offer:	
Why was the offer made:	
Estimated/actual value of offer:	
Is there a current/potential contract with the donor? If yes provide details:	
Signature of employee:	..... Date: .....
Decision:	Approved / Not Approved
Line Manager Authorisation	..... Date: ..... [insert name]
Managing Director Authorisation	..... Date: ..... [insert name]
Regional Chairman/ CFO Authorisation	..... Date: ..... Colin Lewis

**Completed Form must be submitted to Group HR**