MOORHOUSE
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Moorhouse Gifts and Hospitality Policy

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Table of Contents

MOORHOUSE
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1. Why do we have a Gifts and Hospitality policy?

The purpose of this policy is to ensure that all gifts and hospitality, whether offered or received, comply with the ethics and values of Moorhouse. This policy is also in place to ensure that we have a fair and transparent approach to gifts and hospitality.

This policy has been revised in accordance with the UK Bribery Act 2010 and should be read in conjunction with the Moorhouse Anti-Corruption and Bribery policy.

2. Guiding Principles

The purpose of gifts and hospitality in a business setting is to create goodwill and to help build long-term working relationships. It is not to gain unfair advantage with clients, or to influence our choice of suppliers.

All gifts and hospitality, given or received, must be registered and authorised unless it is less than £20.

3. Gifts

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. Accepting and keeping all other gifts is not permitted.

Principles to be applied when considering a gift are:

- The gift must not be a gift of cash or securities
- The gift must be unsolicited
- The gift must be within the value limit specified
- The gift must be a one-off or occasional gift and not form part of a frequent pattern of gift giving
- The gift must not be able to be construed as a bribe or payoff and must not be given with the intent of influencing any business decision
- The gift must not violate any applicable laws or regulations

Employees must not accept any gifts offered during a procurement or tendering process under any circumstances.

Where refusing a gift could cause offence or compromise a relationship, it may be accepted and donated to charity. In these circumstances you must speak to the Finance & Operations Director (Jon Russell) or a member of the P&T team.

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4. Corporate hospitality

Acceptance of corporate hospitality must be transparent and staff must always receive approval from their HR Lead Group Partner before accepting. The following areas are exempt:

a) business and travel expenses incurred while attending events/conferences/seminars, sponsored or supported by third parties
b) normal business lunches and meals (with the exception of lunches/ meals offered as part of a procurement or tendering exercise)
c) gifts provided by frequent flyer loyalty schemes or similar arrangements

To further illustrate what this might mean, reasonable hospitality might include attending a conference, an occasional meal, tickets for theatre or sporting events that are social in nature. These are permitted only if:

d) The host is present
e) The purpose is to hold a bona fide business discussion or to develop better business relations (for example, at a networking event), and not to create any form of obligation
f) The entertainment was openly offered and not solicited
g) Such entertainment is not so frequent, extensive or lavish as to raise questions of impropriety

Unless otherwise specified, the value limits for gifts do not apply to hospitality. However, if the host is not present, the business entertainment must be considered and registered as a gift and will be subject to the gift values.

5. Gifts and Hospitality during an RFP/ITT

During an RFP/ITT process, the instructions below are to be followed until the contract is formally awarded and an agreement signed or until a decline is issued.

- Gifts should not be offered at all
- Hospitality should not be provided, the only exceptions being a “working lunch” where whole day workshops or contract negotiations are being held at Moorhouse offices
- Accommodation and travel costs must not be offered to customers or potential customers for workshops or contract negotiations in a specific place
- Post contract award, the standard gifts and hospitality policy requirements should apply, but individuals must not allow a position to arise where any gift or hospitality might be deemed by others to be a “reward” for the outcome of the RFP/ ITT or subsequent negotiations
- Value limits with regards to gifts and hospitality must be adhered to

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AN EXPLEO COMPANY

6. Gifts and Hospitality Value Limits

Gifts: £125 per gift, not to exceed £250 per year given to any individual or received from a single third party is permitted. You may not accept gifts totalling more than

£1,000 in any given year.

Hospitality: Reasonable and proportionate hospitality is permitted. In the case of sporting or other ticketed events the value is determined by the face value on the ticket.

Hospitality with a value below £20 does not need to be registered. Where hospitality is offered to or received from a particular third party regularly, only the first three instances of hospitality below £20 in any given year do not need to be registered.

Further instances must be registered as hospitality.

Public Officials: Gifts, except low-value branded items, may not be offered or given to any public officials and only limited, proportionate and reasonable hospitality will be approved. The limits above are not applicable.

7. Your Responsibilities

If you are unsure about whether you could be in breach of this policy, you must bring it to the attention of your Talent Lead Group Partner or the Finance & Operations Director immediately. For example, if you accept a gift from a supplier and they later put pressure on you to take some action or make a decision because of that gift, you must advise a member of the Partner team immediately.

It can be helpful to think about your integrity and how an outsider might view a particular offer. In particular, you should ask yourself:

- Is the gift lavish, extravagant or otherwise inappropriate under the circumstances?
- Is the gift or hospitality intended to influence you or the recipient?
- Could there be a perception of improper influence or intended influence?

8. Policy Enforcement

Any breach of this policy will be treated seriously and could result in disciplinary action being taken against you in accordance with the company's disciplinary policies.