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Gift & Hospitality Policy

Introduction

This policy sets out the Erith Groups stance on the acceptance of gifts and hospitality in accordance with the Bribery Act 2010. The following policy will operate alongside the Company's anti-bribery & corruption policy and procedures.

Employees should be aware of the definitions of 'gift' and 'hospitality' given below, however, these are not exhaustive. Whether an item or offer constitutes a 'gift' or 'hospitality' may need to be discussed with their immediate manager on an individual basis.

Receiving gifts

The Company realises that the giving and receiving of gifts and hospitality where nothing is expected in return helps form positive relationships with third parties where it is proportionate and properly recorded. This does not constitute bribery and consequently such actions are not considered a breach of this policy.

A **gift** is an item or service of any value given for free.

Employees are advised to use their judgment on whether a gift would meet the definition of "appropriate". When considering this, employees should consider the bearer of the gift and context in which it is offered. Could it be seen as an incentive for example during a tendering exercise. Employees who require clarification on the appropriateness of an offer must speak with their immediate Manager before accepting.

Accepting hospitality

Employees are permitted to accept offers of corporate hospitality on the condition that prior authorisation is sought from the employee's immediate Manager.

Hospitality is accommodation, entertainment, food and drink or travel, given for free.

In the case of hospitality, a representative from the Company providing hospitality must be present.

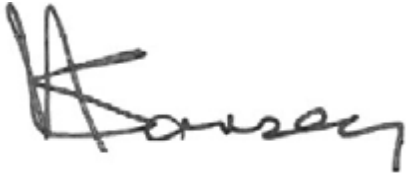
Offering gifts and hospitality

No gift should be given, nor hospitality offered by an employee, or anyone working on our behalf, to any party in connection with our business without receiving prior authorisation from a Director of the Board.

Gift and hospitality register

You should report any gift or hospitality with an estimated value of over £50 to your immediate Manager. Additionally, you should use the Gift & Hospitality Register available on the SharePoint Compliance portal, to report any gift or hospitality, where the estimated value is over £100, or in the case of Directors, where the estimated value is over £200.

A failure to report any gift or hospitality may be deemed a disciplinary offence which will be addressed under the disciplinary policy.

A handwritten signature in black ink, appearing to read 'K. Darsey'.

Signed for and on behalf of the Executive Board
Steven Darsey, Chairman

30th April 2023