



1.0 INTRODUCTION AND PURPOSE

This policy applies to William Hare Group (WHG) and its subsidiary companies. It sets out the ethical and acceptable standards of behaviour which the Board of Directors expects its employees, contractors, consultants and agents to follow in relation to the giving and receiving of business gifts and corporate hospitality and meets WHG's obligations under the Bribery Act 2010.

The purpose of business gifts and corporate hospitality is to create goodwill and sound working relationships, not to develop situations of unfair advantage. WHG recognises that employees may be offered gifts and entertainment from other companies, WHG contacts, suppliers or clients. This Policy sets out WHG's rules on the giving and receiving of business gifts and corporate hospitality, to protect both the individual and WHG.

2.0 ACCEPTING GIFTS

Employees can accept token gifts given by way of trade marketing for use in the office such as calendars, pens and diaries, or where it is a goodwill gesture such as a bottle of wine or something similar to express thanks, offer congratulations or as a Christmas gift.

However, employees should not accept, cash gifts, gifts which are, extravagant and out of proportion or that have conditions attached to them or any sort of gift where it may be construed as an inducement to favourably influence a business decision. If an employee is offered any of these gifts, they should decline it politely, explaining that WHG does not permit them to accept it, unless to do so would be embarrassing or insulting (for example because the gift is offered in public). The employee should also inform their line manager immediately.

If an employee is offered a gift and they are not sure whether they can accept it, the employee should speak to their line manager who will decide if the proposed gift is legitimate, proportionate and reasonable and whether it can be accepted or has to be returned to the donor.

3.0 OFFERING GIFTS

Employees can offer suitable gifts where appropriate. These include items for marketing purposes, such as calendars, pens and diaries and, where the gift is occasional and not regular or repeated and are for purposes such as a goodwill gesture to express thanks or offer congratulations or as a Christmas gift.

If an employee wants to offer more than this gift, the employee should speak to their line manager who will decide if the proposed gift is legitimate, proportionate and reasonable.

Employees should never offer, cash gifts, or any sort of gift where it may be construed as an inducement to favourably influence a business decision or the employee knows that the recipient is not allowed to receive it.



4.0 CORPORATE HOSPITALITY AND ENTERTAINMENT

WHG participates in corporate hospitality and entertainment to create goodwill and promote good relationships. For example, attendance at sporting events and dinners are an appropriate way to do this if they are a legitimate, proportionate and reasonable. Working lunches / meals are also appropriate, as long as they are in line with WHG's expenses policy.

However, corporate hospitality and entertainment should not be offered or accepted if, it is lavish or extravagant such as offers of holidays or holiday accommodation / travel, it may be construed as an inducement to favourably influence a business decision or when the employee knows the recipient is not allowed to accept it.

If an employee is unsure as to whether a particular invitation is appropriate, they should seek guidance from their line manager who will decide if the invitation is legitimate, proportionate and reasonable and whether it can be offered or accepted.

When attending corporate hospitality and entertainment events, employees are representing WHG and so should treat the host and other employees with consideration and respect, and as always their line manager should be aware of their attendance.

5.0 BREACH OF THIS POLICY

Any breach of this Policy is a serious matter and could result in disciplinary action being taken under the Company's disciplinary procedure.

Signed:

A handwritten signature in black ink that reads "Hugo Camacho".

Hugo Camacho
Chief Operating Officer
For and on behalf of William Hare Group