10 Hospitality and Gifts Policy

Rapidfix Ceilings and Partitions Ltd Hospitality and Gifts Policy 04/02/2021

1. Introduction

1.1 **Rapidfix Ceilings and Partitions Ltd** recognises that trust and confidence in the propriety of its activities is essential to its continuing success and growth.

1.2 In order to foster the trust and confidence that clients, suppliers, workers, and the community in general have in **RCP Ltd**, it is important that **RCP Ltd**, its employees and agents behave, and are seen to behave, appropriately and honestly at all times.

1.3 This Hospitality and Gifts Policy aims to:

1.3.1 Protect the reputation of **RCP Ltd**;

1.3.2 Protect employees from accusations of impropriety;

1.3.3 Ensure that all clients and suppliers are dealt with on an equal basis;

1.3.4 Avoid any potential conflicts between employees' private interests and professional duties;

1.3.5 Instil a strong anti-corruption culture in **RCP Ltd** and put in place a gift and hospitality monitoring process to further compliance with the **Bribery Act 2010.**

Please refer and consult with 04 RCP Ltd Anti Bribery Policy

1.4 Employees are advised that, notwithstanding anything contained herein, where there is any doubt over the permissibility or propriety of accepting a gift or hospitality offer, they should decline that offer.

1.5 Nothing should be accepted which would bring **RCP Ltd** into disrepute.

1.6 This policy applies to **RCP Ltd** and to any associated persons as defined by the Bribery Act 2010. (As per 1.3.5)

2. Receiving Gifts

2.1 Except for gifts of low value and which are mere tokens, such as ;

2.1.1 promotional pens, calendars, and stationery

2.1.2 Excluding money, employees of **RCP Ltd** are not permitted to accept any gifts from sub-contractors', customers, suppliers or other third parties involved with **RCP Ltd**.

2.2 **RCP Ltd** recognises that there may be exceptional instances when refusing a

gift will cause significant offence or embarrassment.

2.3 In such instances the gift may be accepted and subsequently donated to a charity of **RCP Ltd** choice.

2.4 Where practicable any employee is reminded that prior to accepting any gift that they should first seek approval from an **RCP Director**.

2.5 If it is not practicable to gain prior approval, the accepting employee should inform their immediate **RCP Ltd** manager as soon as possible after receiving the gift.

2.6 An accurate record must be kept of all gift offers made to **RCP Ltd** or to employees of **RCP Ltd** by third parties and must be filed in the "Hospitality and Gifts Register". Any employee who is offered a gift which is not merely a token should record, as soon as is reasonably practicable:

   2.6.1 A description of the gift offered;

   2.6.2 An estimation of the value of the gift offered;

   2.6.3 Whether it was rejected or accepted;

   2.6.4 If accepted, why it was accepted;

   2.6.5 Whether prior approval was obtained, and if so, from whom; and

   2.6.6 Who it is donated to (see sub-Paragraph 4.4 below)?

3. Hospitality

3.1 "Corporate Hospitality", for the purposes of this policy, is

   3.1.1 Any form of accommodation

   3.1.2 Entertainment

   3.1.3 Or other hospitality provided for an employee of **RCP Ltd** by a third party and which is extended to the employee solely or significantly due to his position as a representative of **RCP Ltd**.

   3.1.4 This excludes the classes of hospitality particularised at paragraph 3.2 below.

3.2 For the purposes of this policy and for clarity, the following are not normally considered Corporate Hospitality and will not require any approval prior to acceptance:

   3.2.1 Normal working lunches or refreshments provided during a business visit;

   3.2.2 Hospitality extended to employees attending an **RCP Ltd** approved seminar, conference, or other external event, provided that such hospitality is extended to all who are in attendance;

      3.2.3   Free seminars, talks or workshops, provided that they are free to all in attendance and are not provided solely for employees of **RCP Ltd**.

3.3   All employees are required to obtain approval before accepting any form of Corporate Hospitality which is offered to them. Approval must be sought from **RCP Ltd Company Director**.

3.4   An accurate record must be kept of all Corporate Hospitality offered to **RCP Ltd** or to employees of **RCP Ltd** for entry on the [Register](#).

3.5   Any employee offered any form of Corporate Hospitality must record, as soon as is reasonably practicable:

      3.5.1   A description of the hospitality offered;

      3.5.2   An estimation of the likely value of the hospitality;

      3.5.3   Whether it was rejected or accepted;

      3.5.4   If accepted, why it was accepted; and

      3.5.5   From whom prior approval was obtained.

4.   Hospitality and Gifts Register

4.1   The Register shall be held by a Director or nominated deputy ("the Registrar").

4.2   All offers of gifts or hospitality must be recorded on the Register Entry Form.

4.3   The Register Entry Form must be signed by the employee and countersigned by the relevant manager before being returned to the Registrar.

4.4   It is anticipated that instances may arise where a gift accepted by **RCP Ltd** or one of its employees has not been donated by the time that the relevant entry is made on the Register.

4.5   In such cases the Register must be updated within **14 working days** of the date on which the donation was made.

5.   Breach of this Policy

5.1   Compliance with this policy is essential to the protection of **RCP Ltd** reputation and that of its employees and sub-contractor supply chain.

5.2   Any employee or associate person who is found to have acted in contravention of this policy or its principles may be subject to disciplinary action, including summary dismissal where the breach amount to gross misconduct.

5.3   Any supplier or sub-contractor or similar breaching this policy will be liable to an internal investigation and where found in breach will be removed from the RCP Ltd supply chain.

5.4   This includes sub-contractors and sole traders that undertake activities on

behalf of **RCP Ltd.**

5.5   Any employee or any associated person (as defined by Section 8 of the Bribery Act 2010) found giving or receiving bribes or will face criminal charges under the provisions of the Bribery Act 2010. Anyone found guilty of bribery, will be responsible for bearing any related remedial costs such as losses, court fees or expenses.

This policy has been approved & authorised by:

Signed	
Name:	Dan Elwell
Position:	Operations Director
Date:	04/02/2021

RCP Ltd
Hospitality and Gifts Register

All the persons offering/receiving gifts and/or hospitality have been listed and added by RCP Ltd Directors according to the Hospitality and Gifts Policy. This list is for reference and can be amended only by RCP Ltd Management.

Last Date Amended: Amended by: <<insert name and job role/management>>   Signature:

Appendix 1 Hospitality and Gifts Register

All the persons offering/receiving gifts and/or hospitality have been listed and added by RCP Ltd Directors according to the Hospitality and Gifts Policy. This list is for reference and can be amended only by RCP Ltd Management.

		ITEMS ACCEPTED						
No.	Name of person receiving gift/hospitality	Offered by	Accepted	Reason for acceptance	Who authorised the acceptance	Item(s) description	Value or Estimated Value in £	Date

HOSPITALITY AND GIFTS REGISTER

Appendix 1 Hospitality and Gifts Register

1	<<name>> <<job role>> <<phone and email>>	<<name>> <<company, address>> <<phone and email>>	<<Yes/No>>	<< >>	<<name>> <<phone and email>>	<<insert description>>	£<< >>	<< >>
2	<<name>> <<job role>> <<phone and email>>	<<name>> <<company, address>> <<phone and email>>	<<Yes/No>>	<< >>	<<name>> <<phone and email>>	<<insert description>>	£<< >>	<< >>
3	<<name>> <<job role>> <<phone and email>>	<<name>> <<company, address>> <<phone and email>>	<<Yes/No>>	<< >>	<<name>> <<phone and email>>	<<insert description>>	£<< >>	<< >>
4	<<name>> <<job role>> <<phone and email>>	<<name>> <<company, address>> <<phone and email>>	<<Yes/No>>	<< >>	<<name>> <<phone and email>>	<<insert description>>	£<< >>	<< >>

RapidFix
Ceilings & Partitions Limited

Appendix 1 Hospitality and Gifts Register

No.	Name of person donating gift/hospitality	Donated to:	Accepted	Reason for donation	Who authorised the donation	Item(s) description	Value or Estimated Value in £	Date
			ITEMS DONATED					
1	<<name>> <<job role>> <<phone and email>>	<<name>> <<company, address>> <<phone and email>>	<<Yes/No>>	<< >>	<<name>> <<phone and email>>	<<insert description>>	£<< >>	<< >>
2	<<name>> <<job role>> <<phone and email>>	<<name>> <<company, address>> <<phone and email>>	<<Yes/No>>	<< >>	<<name>> <<phone and email>>	<<insert description>>	£<< >>	<< >>
3	<<name>> <<job role>> <<phone and email>>	<<name>> <<company, address>> <<phone and email>>	<<Yes/No>>	<< >>	<<name>> <<phone and email>>	<<insert description>>	£<< >>	<< >>
4	<<name>> <<job role>> <<phone and email>>	<<name>> <<company, address>> <<phone and email>>	<<Yes/No>>	<< >>	<<name>> <<phone and email>>	<<insert description>>	£<< >>	<< >>