



Corporate Governance

# Group Gifts and Hospitality policy

<b>Owner</b>	Group General Counsel & Company Secretary
<b>Last reviewed</b>	September 2023
<b>Version</b>	5

## INTRODUCTION

Our ability to do business and our reputation relies on conducting business to high ethical standards. Therefore, it is important to operate in a transparent way, fully complying with the law, making sure our employees work in a corruption-free environment and choose our business partners, suppliers and customers in line with our standards.

The policy sets out our approach to gifts and hospitality and the standards that our employees must uphold to ensure that we are compliant with our legal obligations.

This Policy applies to all employees across the Group as well as contractors, agents, consultants or any others working for, or on behalf of, SIG.

*In this document 'SIG' refers to SIG plc and its affiliate companies. 'Our' 'we' and 'Group' refers to SIG plc. 'You' refers to all employees across the Group, as well as contractors, agents, consultants or any others working for, or on behalf of, SIG.*

## PRINCIPLES OF GIFTS AND HOSPITALITY

Business gifts are goods, services or any item of value provided to, or received from, a person or entity outside of SIG. They are often given as a mark of appreciation, to build business relationships or promote a company.

Hospitality includes food, drink, accommodation, flights or other means of transport, or entertaining (including receptions, sponsorships and tickets to entertainment, social or sporting events) given to, or offered to, or received from, a person or entity outside of SIG.

You can offer or receive gifts or hospitality, as long as they are reasonable and justified. All gifts or hospitality should be proportionate, appropriate and should not be unnecessarily lavish. In all cases, the authorisation requirements for gifts and hospitality set out in this Policy must be followed. Customers and suppliers may have their own rules regarding the giving and receipt of gifts and hospitality. If You are aware that a customer or supplier is unable to accept an offer of a gift or hospitality, then no such offer should be made.

Offers of gifts (especially cash or cash equivalents) made by suppliers, contractors or customers to immediate family (partner, spouse, parents, children) of employees of the

Group should be declined.

Gifts and hospitality are acceptable when they are:

- offered or accepted with no intention of influencing a third party to obtain or retain business or a business advantage
- offered or accepted with no intention of influencing a third party in explicit or implicit exchange for favours or benefits
- compliant with local law and in accordance with the authorisation requirements set out below
- appropriate given the circumstances
- appropriate type or value, at an appropriate time
- received openly, not in secret.

Gifts and hospitality are not acceptable when they are:

- given, promised, offered, or accepted as a payment with the expectation or hope that a business advantage will be received, or to reward a business advantage that has been given
- given, promised, or offered as a payment to a government official, agent or representative to 'facilitate' or expedite a routine procedure
- given, promised, offered or accepted as a payment during a procurement process, if the other party is involved in any way in that procurement process, unless the relevant Managing Director or Group Function Head has given their approval for it
- given or offered in cash or a cash equivalents (such as gift certificates or vouchers) of any value.

If You are uncertain as to what constitutes a gift or hospitality; whether a gift or hospitality can be accepted; or how to record it, You should speak to your line manager in the first instance.

## APPROVAL LEVELS FOR GIFTS AND HOSPITALITY

The approval levels are set out in the framework below. For specific detail in relation to your country and currency, please see your local, translated Gift & Hospitality Policy.

All gifts and hospitality, whether given or received, must be recorded in accordance with the framework, irrespective of whether they are accepted or declined, and authorisation must be obtained in advance.

Gifts should not form part of a regular pattern and any accumulation of gifts from the same person or company over a 12 month period (exceeding £150 over the year) should be authorised before being offered/accepted and recorded on the Gifts and Hospitality Register.

Cash or cash equivalents (such as gift certificates or vouchers) of any value should never be accepted.

Where hospitality or a gift is received, the cost of the benefit should be estimated or alternatively, if there is any uncertainty, ask the host or giver of the hospitality/gift. If it is borderline between two different sizes in the approvals framework, then assume that the higher cost is correct.

Approvals Framework:

Size & Total Costs	Authorisation required	Recording process
<b>Small</b> Up to £150 per person (or equivalent in local currency and exclusive of all local sales or other taxes)	None	None
<b>Medium</b> From £150 - £500 per person (or equivalent in local currency and exclusive of all local sales or other taxes)	Line manager	Gifts and Hospitality Register
<b>Large</b> Over £500 per person (or equivalent in local currency and exclusive of all local sales or other taxes)	OpCo Managing Director or ELT Member (as appropriate)	Gifts and Hospitality Register

If a gift or hospitality offered to You does not comply with the Policy because conditions or limits are breached, or if authorisation is not given, politely decline the offer and (if of appropriate size) ensure it is recorded on the Gifts and Hospitality Register. If You have

concerns about the legitimacy of a gift or hospitality, the matter should be referred to your line manager before proceeding.

**When in doubt about accepting hospitality or a gift always consult your line manager. In all instances where anything beyond conventional hospitality or gifts is offered, the matter should be referred to your line manager before proceeding.**

## RECORDING OF GIFTS AND HOSPITALITY

Each Opco must maintain its own Gifts and Hospitality Register detailing all gifts and hospitality offered or received by that OpCo. SIG Corporate/Group must also maintain its own Gifts and Hospitality Register detailing all gifts and hospitality offered or received by Corporate/Group.

Gifts and Hospitality Registers are audited on a regular basis to ensure compliance with this Policy.

## RESPONSIBILITIES

### **Employee responsibilities**

As an employee, You must be open and transparent about the giving, offering or receiving of gifts and hospitality and You must ensure they are recorded on the relevant Gifts and Hospitality Register in accordance with this Policy.

Employees who are found to be in breach of this Policy will be subject to disciplinary procedures up to and including dismissal from the Company. Any suppliers, agents, advisers and third-party partners who breach the policy may have their contracts terminated.

The Company reserves the right to report any breaches of the policy, which may amount to bribery and corruption, to the relevant police authority for investigation and, if appropriate, prosecution.

If you have any concerns, you should raise this with your line manager, supervisor or your local HR team in the first instance. Alternatively, the Group operates a Whistleblowing Policy and procedure, which allows You to raise any concerns to senior management or via our external partner confidentially and/or anonymously. Any employee raising genuine concerns

about unethical behaviours or practices can do so without fear of any reprisal, discrimination or victimisation.

Please see the [Group Whistleblowing Policy](#) for further information.

### **Management responsibilities**

If You are a manager, You must ensure that any members of your team who are in a position of offering or receiving gifts or hospitality are aware of and understand their obligations and report them in the correct way. You should also ensure You are aware of any activity taking place that may include the giving or receiving of gifts or hospitality and monitor and review this activity to ensure compliance with this policy.

## **IMPLEMENTATION**

The Chief Executive Officer has lead responsibility for the implementation of this policy within SIG. However, it is the responsibility of each SIG employee and third-party to comply with this Policy.

The Group General Counsel & Company Secretary is responsible for maintaining and reviewing this Policy, and for clarifying and resolving general issues.

## **FURTHER GUIDANCE AND SUPPORT**

Any questions on the content of this policy, or for further guidance or support, please contact the Group General Counsel & Company Secretary via email at [cosec@sigplc.com](mailto:cosec@sigplc.com).

Further information can also be found in the following related Policies available on [sigplc.com](http://sigplc.com) or the employee intranet:

- [SIG Code of Conduct](#)
- [Group Anti Bribery and Corruption Policy](#)
- [Whistleblowing Policy](#)
- Group Expenses Policy