

# OUR GIFTS & HOSPITALITY POLICY

## GIFTS & HOSPITALITY:

We appreciate that giving and receiving gifts or hospitality can help build goodwill in business relationships but they are only appropriate in limited circumstances. In no circumstances should any employee offer, give or accept any gift or hospitality, regardless of value, which might be construed as influencing a business decision.

Consider the following points when you are faced with an opportunity to give or receive gifts or hospitality:

- What is your intention when offering a gift or hospitality or what do you think is the intention of the business partner when offering the same to you?
- Is the intention to build a business relationship or to influence a business decision such as the award of a tendered contract?
- Is the nature of the gift or hospitality modest or could it make you (as the recipient) feel under an obligation to give something back?
- Have you checked to see if the gift/hospitality is legal in the country of both the recipient and the offeror? Be particularly careful when considering gifts or hospitality for government officials as some countries do not allow this.
- Have you checked if the recipient of the gift or hospitality is allowed under their gifts policy to receive this?
- Are you happy to justify giving or receiving the gift or hospitality? If it doesn't feel right, it probably isn't.

## DOES IT MATTER WHAT KIND OF GIFT OR HOSPITALITY I OFFER?

There are some kinds of gifts or hospitality which should never be considered as acceptable. You should not give, offer, receive or approve any:

- Gifts or hospitality involving third parties involved in any competitive bid or tender process that you are –or may be considered to be –involved in;
- Gifts or hospitality that would be illegal under local laws such as offering a gift to a government official which may be seen as a bribe under local law –please ensure you are familiar with your local legal obligations;
- Payments of cash (or cash equivalents) or paying someone else's personal bills or expenses;
- Any hospitality that might be in breach of this Code of Business Conduct or that may be considered indecent or inappropriate as part of a business relationship or which may have a negative effect on Compass' reputation; and
- Gifts or hospitality that you are not prepared to report or seek approval for internally irrespective of whether you use personal or company hospitality.

You must always seek prior approval from your Line Manager before offering or accepting any gift or hospitality.

## FOR TOP 10 COUNTRIES:

You must always seek approval from your Managing Director (or other appropriate officer designated by your Managing Director) before offering or accepting any gift or unbudgeted hospitality\* which may exceed, for each recipient, the following limits in any 12 month period commencing 1 October each year:

- Hospitality (including meals) that exceeds the lower of (a) £3,000 or (b) the lower local limit set by your country Managing Director;
- Gifts valued at more than £100 (or any lower local limit); or
- Travel or overnight accommodation provided or offered by way of hospitality.

In addition, prior approval must be sought from your Group Managing Director for a) any hospitality valued at more than £5,000 (for up to 5 people); b) any hospitality valued at more than £7,500 (for between 6 -10 people) or c) gifts valued at more than £500. AIC approval must always be sought for gifts valued at more than £2,000 and for hospitality valued at more than £75,000.

Please note that these values are Group standards which are set out in the Group Approvals Manual, which may be subject to change from time to time. The local gifts and hospitality policy in the country in which you work may set more stringent thresholds with which you must comply. It is your responsibility to familiarise yourself both with the thresholds that apply in your local country and the thresholds set out in the Group Approvals Manual.

## ACCEPTING GIFTS:

We appreciate that in some countries and cultures, it may be considered an insult to decline a gift that is offered to you but would otherwise be in breach of the Code of Business Conduct. In such circumstances, you may accept the gift but you must immediately report it to your Line Manager who will advise whether you can keep the gift, if it should be returned to the donor or sold with the proceeds being donated to charity.

Under no circumstances should you accept any gifts of cash (or cash equivalents such as a bank cheque, money orders, investment securities or payment of personal bills or expenses).

## VISITS FROM GOVERNMENT, JOINT VENTURE, PUBLIC AND STATE OWNED COMPANY DELEGATES:

Due to the nature of our business, we sometimes receive visits from government, joint venture or state owned company delegates to our offices or sites where we operate around the world. Whilst it is acceptable to promote, demonstrate and explain the benefits of the services that Compass offers, there should be no attempt to influence any decisions by offering personal benefits.