About this policy

We expect excellent standards of conduct from everyone and this includes being open and transparent about gifts and hospitality provided or received.

This gifts and hospitality policy explains the standards and behaviour required of our employees and business partners to comply with the expectations of the business and the Bribery Act 2010.

This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, agents, contractors, external consultants, third-party representatives and business partners, sponsors, or any other person associated with us, wherever located.

Any employee found breaching this policy will face disciplinary action, which could result in dismissal for gross misconduct. Any non-employee who breaches this policy may have their contract terminated with immediate effect.

This policy does not form part of any contract of employment or other contract to provide services, and we may amend it at any time.

This policy should be read in conjunction with the Anti Corruption and Bribery Policy.

Principles concerning bribery and gifts

We accept that the occasional modest giving and acceptance of gifts and hospitality may be a legitimate contribution to good business relationships. However, it is essential that they do not influence, nor could be perceived as influencing, business decision making. We must all consider whether the giving or receiving of a gift or hospitality is appropriate and ensure that they are given and received openly and without any attempt to mislead or hide their nature, value, purpose, or identity of the giver and recipient.

Gifts include any item of value provided to a third party or their employees or received from a third party by us or our employees. (See table below for definitions of value).

Hospitality includes any business entertaining, such as travel, accommodation, meals and invitations to events given to Natara and its employees by third parties or given by Natara to third parties.

It is prohibited to:

* Offer or receive gifts or hospitality that could:
* influence or be perceived as capable of influencing the outcome of transactions or decisions relating to our business;
* amount to or cause the recipient or giver to commit a criminal offence;
* cause offence to others or damage the reputation of Natara.
* Use personal money to provide gifts or hospitality to avoid complying with this policy, even if no reimbursement is sought from the organisation.

A business unit or function may, at its discretion, impose a more onerous policy. Where this applies, individuals are subject to the more stringent requirements of the business unit or function.

Procedure for receiving gifts or hospitality

In principle, we do not encourage employees to either give or receive gifts from third parties including clients and suppliers. In particular, the following should not be accepted:

* Gifts that are unduly lavish or which are conditional on particular behaviours or conduct.
* Cash and cash equivalents.
* Gifts from anyone directly or indirectly involved with a pending bid, application, contract or decision that could impact our business.

These gifts should be returned to the third party with an explanation to the effect that it is not our policy to accept gifts.

We recognise, however, that declining a gift may cause some offence. When considering whether to accept or decline a gift, please use the table below and ensure the correct procedure is followed:

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| **Benefit received** | **Procedure** |
| Small gift (branded), below £50  (includes diaries, calendars, pens and so on) | Individuals may accept. No recording or approval required. |
| Small gift (non-branded), below £50  (includes diaries, calendars, pens and so on) | Individuals may accept. No recording or approval required unless two or more gifts are received within a six-month period in which case notify your line manager. |
| Gifts worth £50 or more    (includes bottles of champagne, spirits, tokens, vouchers, presents and so on) | Individuals may accept gifts between £50 and £300 with prior written approval from their line manager. Gifts exceeding £300 require prior written approval from the Chief People Officer or Chief Financial Officer. All gifts must be recorded and surrendered to the business to be disposed of in one of the following ways:   * Displayed in the office. * Raffled off to allow all employees in the department or business to have a chance to benefit. * Donated to a charity. * If edible, placed in a break room for everyone to share. * Otherwise disposed of in a manner determined by the Chief People Officer. |
| Attendance at business functions associated with your role in Natara or your professional status (that is, professional dinners or events) | Obtain prior written consent from your line manager and record the attendance. |
| Attendance at purely social events (such as sporting events, horse racing, golf days) | In all cases (irrelevant of value) seek prior written approval from your line manager and record.  If the value is £300 or more, prior written approval should also be obtained from the Chief People Officer or Chief Financial Officer and recorded. |
| Hospitality accepted (such as lunches, dinners) | Ensure that the hospitality is reasonable, proportionate, not lavish and that the organisation would be willing to reciprocate.  For all hospitality accepted the following steps apply:  Where the value is less than £150, then it should be reported to line manager and recorded.  Where the value is between £150 and £300 obtain prior written approval from your line manager and record.  Where the value is more than £300 must also obtain prior written approval from the Chief People Officer or Chief Financial Officer. |

Approvals must be in writing, which may include email.

When determining the monetary value of a benefit you must consider market value. If no monetary value can be placed on a benefit then consider if accepting it could create a conflict of interest or be perceived to be inappropriate and seek guidance from your line manager.

What steps to take when giving gifts or hospitality

In general, gifts should not be given to clients or potential clients, third parties or anyone outside of Natara. The exceptions to this rule are Natara branded products (for example, pens and stationary), modest refreshment and hospitality and celebrations (for example, the conclusion of a project). In determining whether giving a gift is appropriate, consideration should be given to the recipient, the value of the gift and the reason for it. If you are in doubt as to whether a gift or hospitality should be given, please seek advice from your line manager.

Hospitality given should be within the boundaries of the Natara’s Travel & Expense Policy. Hospitality may be offered if it is reasonable in all the circumstances to do so and is proportionate and not lavish or extravagant.

It is essential that the following steps are taken when giving gifts or hospitality:

* + - Gifts or hospitality given must be pre-approved by the Chief People Officer or Chief Financial Officer. If permitted to proceed, a documented record of approval must be maintained and all receipts retained.
    - Benefits provided with a value exceeding £100 in total must be recorded with details of the individual or customer to whom it was provided.
    - Gifts and hospitability given must be consistent with the policy of the applicable third party organisation.
    - Under no circumstances shall Natara partners (including suppliers, business partners, joint venture partners, subcontractors or advisors) be asked to contribute towards the cost of entertaining customers on our behalf.
    - There is an enhanced risk that gifts or hospitality provided to foreign public officials may be construed as a bribe, in these circumstances pre-approval must be given by the Chief Financial Officer.