

Gifts and Hospitality Policy



Summary

This policy applies to all UPP employees and companies and sets out our approach to offering and receiving gifts and hospitality from external business parties. Any gift, entertainment or hospitality which is offered by or received by an employee, irrespective of whether it is accepted or not, must be declared using the [Gifts and Hospitality Form](#). Any gift, entertainment or hospitality offered must be in line with UPP's Expense Policy and UPP's Procurement Policy.

SECTION A: Background & Objectives of the Policy

UPP operates in the global market where standard business practices involve the offer and acceptance of gifts and hospitality, to develop and strengthen business relationships. It is imperative, however, that the giving or receiving of gifts and hospitality can stand up to scrutiny. Gifts and hospitality must be reasonable and appropriate and must not exceed normal business courtesy. Their primary purpose should focus on establishing cordial relationships with business partners.

As per the Code of Business Ethics policy, it is our policy to conduct all our business in an honest and ethical manner. This Policy outlines how UPP employees can ensure their conduct is appropriate to the nature of UPP's business and the environment in which it operates. It offers guidance to assist individuals to determine an appropriate use of gifts and hospitality and to avoid allegations of impropriety.

External business parties refer to all non-UPP staff including, but not limited to, third party, contractors, vendors, suppliers, external contacts, external clients, university partners.

Multiple gifts, entertainment or hospitality from the same external business parties over the financial year period must be avoided; the cumulative annual value received to UPP will be considered.

This policy is designed to protect the Company, its Directors, and its Employees from any criticism over gifts, hospitality, entertainment, and donations given or received by virtue of that person's employment, for personal gain or for the benefit of the Company, and which may create the appearance of a conflict between the person's interests and that of the Company and its clients.

SECTION B: Policy Details

Section A – Gift

a) *Accepting and Receiving Gifts*

The acceptance of gifts from external business parties could be presented as promoting a conflict of interest that might arguably have compromised the impartiality of members and staff in the decisions that they were required to make.

Gifts, which do not exceed a value of more than £30, may be regarded as "trivial" in nature and therefore may be accepted by employee with the approval from their line manager. This will still need to be declared on the form.

Gifts, which have an apparent value of more than £30 require the approval of your line manager and you must seek approval of acceptance from the Governance, Risk and Compliance Team through the submission of your completed form. Any gifts not approved may need to be returned or auctioned for charity.

The general principles are:

- The gift must be of a nominal or notional value.
- Typically, a gift should not be accepted if the cumulative value from any one organisation or individual exceeds £200 over the financial year period
- The gift must be given for an appropriate reason.
- The gift must be given at an appropriate time (e.g., not in advance of the issuing of an opinion or determination, or in advance of the award of a contract).
- The gift must be of a “one-off” or irregular nature (i.e., that could not be viewed as a regular source of income by HMRC for personal taxation purposes).
- The details of all gifts accepted or declined, irrespective of value, should be fully declared in using the Gifts and Hospitality Form and recorded in the Gifts and Hospitality Register within 30 days of receipt.

The following gifts must not be accepted in any circumstances (this list is not exhaustive):

- Cash.
- Gift vouchers.
- Personal loans.
- Airline tickets.
- Use of holiday property.
- Offers of heavily discounted services or works for personal benefit of an individual.

b) Offering and Giving Gifts

As per the Expense Policy, Charitable donations or sponsorships and gifts to external business parties can only be made on the direct authority of the CEO or CFO. In addition, an employee should not use UPP’s issued Purchase Card or claim cash expenses for any gifts to employees other than in direct relation to the performance of their job and should be approved in advance by the CFO and Chief HR Officer.

Gifts to external business parties can only be offered on approval of the CFO or CEO. Multiple gifts to the same supplier chain partner/university partner over a 12-month period should be avoided.

The details of all gifts offered, irrespective of value, should be fully declared using the Gifts and Hospitality Form and recorded in the Gifts and Hospitality Register

The following gifts must not be offered to external business parties in any circumstances (this list is not exhaustive):

- Cash
- Gift vouchers
- Personal loans
- Airline tickets
- Use of holiday property
- Offer of heavily discounted services or works for personal benefit of an individual

c) Receiving Gifts, Offering Gifts – UPP

Personal gifts exchanged between UPP colleagues may be retained by the recipient. These do not need to be declared.

Section B – Entertainment and Hospitality

a) Entertainment and Hospitality

Entertainment typically involves drinks, lunches, dinners or invitation to events where the external business party is present. Such routine entertainment is appropriate and should be encouraged if it is clearly in the proper interest of the Company, i.e. when a bona fide business relationship is being established or where an on-going business relationship is being maintained.

Hospitality typically involves travel, accommodation, lodging, the opportunity to attend any cultural, business or sporting event where the external business party may or may not be present. This list is not exhaustive.

Employees are expected to exercise care in deciding what is routine and must take into account the apparent value of entertainment and how it would be perceived.

b) Accepting Entertainment

Where the value of entertainment is expected:

- To be under £30, no declaration is required e.g. coffee
- Not to exceed £150 per person it must be approved by their Line Manager by email and the clearance must be retained as the record of approval. It is acknowledged that participation in such lunches and dinners is a routine part of maintaining and building important business relationships for UPP; employees are required to consider whether such lunches or dinners have a legitimate business purpose and appropriate to the relevant circumstances.
- To exceed £150 per person, prior approval must be obtained from the Director of Governance, Risk and Compliance.

In the case of a Member of the ELT, clearance should be obtained from the CEO on all Entertainment over £150.

In the case of the CEO, clearance should be obtained from the Chair over £200.

c) Giving Entertainment

The giving of staff and business entertainment is controlled by the pre-existing Expense Policy. Please refer to UPP's Expense Policy.

d) Accepting Hospitality

Unless exceptional circumstances apply, the gift of any hospitality by an external business party to an UPP employee and/or their family will not be acceptable unless their presence is directly attributable to and necessary for a true business purpose and their purpose is detailed on the Gifts and Hospitality Form.

Any exception will require clearance of the Director of Governance, Risk and Compliance

In the case of Member of the ELT, clearance should be obtained from the CEO on all hospitality irrespective of value

In the case of the CEO, clearance should be obtained from the Chair irrespective of value.

e) Giving hospitality

The same principles will apply to the provision of any hospitality by UPP employee and/or their family to an external business party.

Unless exceptional circumstances apply, the gifting of any hospitality from a UPP employee and/or their family to an external business party will not be acceptable unless their presence is directly attributable to and necessary for a true business purpose and their purpose is detailed on the Gifts and Hospitality Form. The same principles will apply to the provision of any hospitality by UPP to an external business party

If exceptional circumstances apply, the exception will require clearance of the Director of Governance, Risk and Compliance.

Any non-local hospitality, i.e., where travelling is required overseas, pre-approval must be obtained from the CEO and Director of Governance, Risk and Compliance. The travel and/or hotel portion for any such event will not be paid for by UPP unless otherwise approved.

Section C – Donations

UPP Foundation and UPP Gives should be used as the charitable mechanism for donations. Any goodwill payments made by or to UPP do not come under this policy and are captured under the governance practices of that company.

Section D – Declarations

To ensure a robust mechanism of capturing all gifts, entertainment, hospitality being received, offered to UPP colleagues, all gifts must be declared using the form. All declarations should be made within 30 days of _____

receiving and offering.

For clarity:

- Gifts: Dependant on value, may be accepted following your line manager approval or require approval first from the Governance, Risk and Compliance Team
- Entertainment: Dependant on value and your role, it may require line manager approval or CEO approval.
- Hospitality: Can only be accepted on exceptional basis following approval first from Director of Governance, Risk and Compliance or CEO (if you are a member of the ELT)
- Donations: UPP Foundation and UPP Gives should be used as the charitable mechanism for donations. Any goodwill payments made by or to UPP do not come under this policy and are captured under the governance practices of that company.

Please ensure you familiarise yourself with the policy to ensure compliance.

SECTION C: Compliance

This policy applies to all UPP employees and companies.

Multiple gifts, entertainments of employees by the same external business party over a short period of time should be avoided. The above limits apply to individual occurrences as well as the cumulative value over the financial year.

The Director of Governance, Risk and Compliance has primary and day-to-day responsibility for implementing this policy and for monitoring its use and effectiveness and dealing with any queries on its interpretation. Management at all levels are responsible for ensuring those reporting to them are made aware of, and understand this policy.

The Gifts and Hospitality Register is kept by the Governance, Risk and Compliance team at Head Office. For Tax compliance purposes, the Tax team will review the contents of the Gifts and Hospitality register.

If you become aware of behaviour by one of your colleagues which you believe breaches this policy, you should report your concerns to your line manager.

SECTION D: Further Information & Queries

For further information please contact the Compliance team on compliance@upp-ltd.com.

Information	
Version Number:	Version 2.1
Version Approved:	May 2022
Purpose of Revision:	Annual Review
Policy Author:	Director of Governance, Risk and Compliance
Policy Sponsor:	Chief Financial Officer
Related Policies:	Anti-Bribery Policy Whistleblowing Policy Disciplinary Policy Expense Policy Procurement Policy
Proposed Date of Next Review:	May 2024

SECTION E: Further Information & links

Document Title	Purpose of Appendix/Link
Anti-Bribery Policy	See 'Policy Centre' on the Intranet
Whistleblowing Policy	See 'Policy Centre' on the Intranet
Disciplinary Policy	See 'Policy Centre' on the Intranet
Expense Policy	See 'Policy Centre' on the Intranet
Procurement Policy	See 'Policy Centre' on the Intranet
Gifts and Hospitality Form	https://forms.office.com/r/ksetFqCqf0