Gifts and Hospitality Policy



GENISTAR
Financial Freedom For All

Version Control

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1) Introduction

Genistar Limited are required to have in place a Policy on the acceptance of gifts and hospitality. As a financial services company, Genistar has a duty to ensure that its resources are utilised effectively. There is a limited set of exceptions, and the purpose of this policy is to set out the standards and procedures that members of Genistar should follow to protect both them and the business.

2) Purpose

1. This policy is intended to help all members of Genistar understand their responsibility and sets out the procedure that all members of Genistar must follow when giving or receiving gifts and hospitality.

2. The policy should also be read in conjunction with:

- Anti-Bribery and Money Laundering Policy
- Business Code of Conduct and Ethics Policy

3. At the end of this document there is a Q&A section, setting out some scenarios that illustrate potential concerns and steps of action in Appendix 1.

3) Who Does This Policy Apply to?

The policy applies to all members of Genistar including employees, representatives, directors, agents, consultants, contractors and to any other people or bodies associated with Genistar Limited, within all regions, areas, and functions. (Whether permanent, fixed-term, self-employed or temporary).

4) Gifts

The acceptance of gifts and hospitality, even on a modest scale, may arouse suspicion and needs to be capable of public justification. The following guidance should be followed in relation to gifts and hospitality.

4.1. Casual Gifts

1. Casual gifts by suppliers, providers, contractors and third parties at Christmas time, must not be in any way connected with the performance of duties. Items of low value such as diaries, calendars, chocolates and other items of work-related stationery and equipment may be accepted and need not be recorded in the Register.

2. It is also acceptable to receive other small value items but nothing that is in value of more than £25.00.

3. In cases of doubt, advice must be sought from the Business Integrity department. In no case must a gift be accepted without prior written approval of the Business Integrity department if the estimated value of the gift exceeds £25.00.

4. If a gift falls outside of identified 'small value items' and arrives without warning, it must be handed over to the Business Integrity Department who will decide whether the gift should be returned (or passed on to a charity or good cause) and will ensure that the donor is informed of what has happened.

4.2. Cash

Under no circumstances must any member of Genistar accept personal gifts of cash, even below the £25.00 limit.

5) Hospitality

1. All offers of hospitality should be approached with caution. Modest hospitality, for example, a drink and sandwich during a visit or a working lunch is normal and reasonable and does not require approval of the Business Integrity Department. Offers of hospitality relating to theatre evenings, sporting fixtures, or holiday accommodation or other hospitality must be declined.

2. There is an important difference between, for example, attendance in an official capacity at a function organised by a public body and accepting hospitality from a private individual or firm standing to benefit from the goodwill of Genistar.

3. It MUST be noted that under the Bribery Act 2010, any money, gift or consideration received by an member of Genistar from a person or organisation holding, or seeking to obtain a contract or benefit, will be deemed by to have received a bribe unless the member can prove differently.

6) Gifts and Hospitality Overall Summary

Genistar Limited accepts normal and appropriate gestures of hospitality and goodwill (whether given to/ received from third parties) so long as the giving or receiving of gifts meets the following requirements in line with the gifts and hospitality policy:

- It is not made with the intention of influencing the party to whom it is being given, to obtain or reward the retention of business or a business advantage, or as an explicit or implicit exchange for favours or benefits.
- It is not made with the suggestion that a return favour is expected.
- It is in compliance with this policy.
- It is given in the name of the company, not in an individual's name.
- It does not include cash or a cash equivalent.
- It is appropriate for the circumstances (e.g. giving small gifts around Christmas or as a small thank you to a company for helping with a large project upon completion).

- It is of an appropriate type and value and given at an appropriate time, considering the reason for the gift.
- It is given/received openly, not secretly.
- It is not selectively given to a key influential person, clearly with the intention of directly influencing them.
- It is not above a certain excessive value of £25.00, as pre-determined by the Genistar.
- It is not offered to, or accepted from, a government official or representative or politician or political party, without the prior approval of the company's Business Integrity Department.

1. Where it is seen as inappropriate to decline the offer of a gift (i.e. when meeting with an individual of a certain religion/culture who may take offence), the gift may be accepted so long as it is declared to the Business Integrity Department, who will assess the circumstances.

2. Genistar Limited recognises that the practice of giving and receiving business gifts varies between countries, regions, cultures, and religions, so definitions of what is acceptable and not acceptable will inevitably differ for each.

3. As good practice, gifts given and received should always be disclosed to the Business Integrity Department from suppliers or providers.

4. The intention behind a gift being given/received should always be considered. If there is any uncertainty, the advice of the Business Integrity Department should be sought. More information on Categorisations of Gifts and Hospitality can be found in Appendix 2 of this document.

7) Register of Gifts and Hospitality

This section of the policy refers to 4 key areas:

- Gifts and Hospitality
- Facilitation Payments
- Political Contributions
- Charitable Contributions

7.1 Gifts and Hospitality

1. Genistar has a regulatory obligation to maintain a Register for Gifts and Hospitality, which is held with Business Integrity.

2. All members of Genistar are required to report the receipt of gifts and hospitality over the value of £25.00 and the offer of such, regardless of whether they are accepted. The following information is mandatory to be recorded within register:

- The date of the offer
- The person or organisation making the offer

- The member of Genistar to whom the offer was made
- The gift or hospitality offered or declined
- The estimated value of the gift or hospitality
- Procedure for declaring Gifts and Hospitality

8) Procedure for Declaring Gifts and Hospitality

If after referring to the above, it is necessary for a member of Genistar to declare an acceptance or refusal of gifts or hospitality, the following steps should be taken to ensure full compliance with this policy:

- Inform your manage and/or upline immediately. In certain cases of doubt, ask for guidance from the Business Integrity Department
- Contact the Business Integrity Department to inform them of acceptance or refusal
- Supply full detail of the gift/hospitality and estimated value using the Gift and Hospitality Declaration Form
- The Business Integrity Department will ensure the entry is completed on the Gifts and Hospitality Register.

9) Responsibilities

1. As an member of Genistar, employee, representative, director, agent, consultant, contractor and any other people or bodies associated with Genistar, you must ensure that you read, understand and comply with the information contained within this policy, and with any training or other policy you are given.

2. All members of Genistar, employees, representatives, directors, agents, consultants, contractors and any other people or bodies associated with Genistar and those under our control, are equally responsible for notifying the relevant person and department of a gift or hospitality and they are required to avoid any activities that could lead to, or imply, a breach of this policy.

3. If any member of Genistar listed above breach this policy, they will face disciplinary action and could face dismissal. Genistar has the right to terminate a contractual relationship with an employee, representative or any other people or bodies if they breach this policy.

10) Record Keeping

1. Genistar will keep detailed and accurate financial records and will have appropriate internal controls in place to act as evidence for all payments made. We will declare and keep a written record of the amount and reason for hospitality or gifts accepted and given and understand that gifts and acts of hospitality are subject to Compliance review.

2. Genistar must keep records and have appropriate internal controls in place which will record any gift or hospitality. If you are required to register a gift or hospitality under this policy, you must complete the Gifts and Hospitality Declaration form and send it to the Business Integrity Department who will maintain a Register of Gifts and Hospitality.

3. You must register any gift or hospitality within 10 days.

4. You must ensure that all claims relating to hospitality and gifts and other payments to third parties are submitted in accordance with the relevant Genistar policies and specifically record the reason for the expenditure.

11) Policy Compliance and Audit

1. Failure to observe the standards set out in this policy may be regarded as serious and anybreach may render an individual liable to further investigation by the Business Integrity Department which may result in disciplinary or dismissal.

2. Non-compliance with this policy could have a significant effect on the efficient operation of Genistar and may result in financial loss and an inability to provide necessary services to our customers. Genistar will audit its procedures and where practical and proportional.

3. It is the duty of all individuals to report, as soon as practicably possible a Gift or Hospitality.

4. Any individual who does not understand the implications of this policy or how it may apply to them, should seek advice from their upline and/or the Business Integrity Department.

12) Appendix 1 - Questions and Answers (Q&A)

Q: A colleague in another part of the business has offered to buy me lunch. Do I need to register this with my manager/upline and the Business Integrity Department?

A: No – gifts or hospitality given to or by an employee are not considered corporate hospitality. The person offering the lunch should ensure that they do not breach the requirements in the gifts and hospitality policy and the lunch should not cost an excessive value.

Q: Is it ok to meet a client/recruit for lunch to discuss their application?

A: If a client has already been awarded an application then it is reasonable to meet for lunch to discuss things. Make sure that the value of the lunch is not excessive and that you record the invitation with your manager and/or upline before accepting it if the likely value is over £25.00. Please note that any invitations must be recorded with Business Integrity even if you do not intend to accept them. You can do this by completing the Gifts and Hospitality Declaration Form.

Q: Should I register with Business Integrity if a client or recruit offers me a sandwich during a meeting at their premises?

A: No, you don't have to register modest hospitality of this kind, when it has a likely value under £25. You should however, always be mindful of the intention and timing of the offer, whether it might appear to place you under any obligation to an individual or organisation, compromise your objective or otherwise be improper.

Q: Can I attend a provider's golf day if it is being held for charity?

A: If you have been invited to attend a charity golf day at the expense of an external third party then no, you should not accept. If, however you have been invited to an event in which there is a personal fee to participate (the fee should cover the actual cost of participation and shouldn't be a nominal amount) it may be ok to accept. If you are unsure you should contact your manager and/or upline, or Business Integrity for further guidance.

Q: I have been offered an inappropriate gift that I suspect was intended as a bribe. How do I report it?

A: The first thing you must do is let the Business Integrity Department know and email all the details to business.integrity@genistar.net. Once you have raised your concerns you should also register the offer using the Gifts and Hospitality Declaration Form. If you suspect that something is a bribe, politely decline the offer and continue to report it to Business Integrity.

13) Appendix 2 - Categorisation of Gifts and Hospitality

Category	Examples	What You Should Do
A. Do not Accept (Gifts over £25) Generally high value gifts and hospitality which might look as if it has been offered to compromise personal judgement and integrity.	• Financial Gifts • (Money/Gift Vouchers/ Discounts etc) • Expensive Food Hamper • Membership of or subscription to clubs • Tickets to sporting or • Social events • Expensive items of clothing • Holidays	These **cannot** be accepted, or, if difficult to refuse at the time, should be returned as soon as possible
B. Can be accepted depending on value but may be shared Generally lower value under £25 items such as a bottle of wine, or which might be difficult to refuse.	• An evening meal • Bottle of wine • Flowers • Books • CD's	These **can** be accepted. Their receipt does not need to be noted in the register but should be shared. If the gift has a fixed life (e.g. flowers) it can be retained by the individual
C. Can be accepted and kept by the individual (Gifts under £25) Very low value items (Such as material given out at conferences and events)	• Working Lunches/ other low value refreshments • Pens • Key Rings • Mugs • Notebooks • Diaries • Any other small items (in value of £25 or less)	These can be accepted Their receipt does not need to be included in the register.

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GENISTAR LIMITED
Victoria House, Harestone Valley Road, Caterham CR3 6HY
Telephone: +44 (0)20 3372 5085
Authorised and Regulated by Financial Conduct Authority.