



## **Angard Staffing Gifts and Hospitality Policy**

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*Angard Staffing is committed to providing employees with guidance on the giving and receiving of gifts and hospitality so that they remain compliant with the UK Bribery Act (2010).*

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### **Main Content**

- Overview
- Definitions of gifts and hospitality
- Bribery and gifts and hospitality
- Foreign public officials
- Hospitality and entertainment
- Sponsorship
- Charitable donations
- Political donations
- Where to go for further information
- Review

### **Getting help**

Contact the Angard Helpline Number on 0333 240 8502 or email [angard.employee@reedglobal.com](mailto:angard.employee@reedglobal.com) if you have any queries about this policy. For web access please go to: [www.angardstaffing.co.uk](http://www.angardstaffing.co.uk)

## **Overview**

This guide sets out Angard Staffing (**Angard**)'s policy regarding the offer and acceptance of gifts and of hospitality by Angard employees. It applies to all employees working for Angard and, in particular, during any assignment to Royal Mail.

This policy is effective from 1<sup>st</sup> April 2014.

Any breach of this policy, or associated procedure, will be treated as a serious matter by Angard. Breaches may result in disciplinary action, including termination of employment and reporting to the appropriate authorities. In serious cases, where it is found that an individual has accepted or offered a bribe, this may result in criminal penalties.

As well as reading and understanding this Gifts and Hospitality Policy, you must also read and comply with the Royal Mail Group Anti-Bribery Policy to which you will be subject on any assignment with Royal Mail.

## **Definition of gifts and hospitality**

A gift may be anything of value, including a financial or other advantage, such as cash, certificates with monetary value, a loan or sponsorship. It may also be form of goods or services which are offered free, at a preferential rate, or involving some concession favourable to particular Angard employees in that capacity.

Hospitality and entertainment involves the provision of food, drink and/or entertainment free of charge, or at a subsidised cost either within or outside office premises and hours. Any gift, hospitality or entertainment may be an advantage not properly considered and approved could amount to (or look like) a bribe.

## **Bribery and gifts and hospitality**

### ***What is bribery?***

Bribery is promising, offering, requesting or accepting, whether directly or through a third party, any advantage to induce or reward behaviour that is improper (i.e. illegal, unethical or a breach of duty).

An 'advantage' can be any kind of benefit or anything of value, or perceived value.

Bribery, in any form, is never acceptable to Angard. The giving or receiving of gifts and hospitality could amount to a bribe. Any action considered a bribe, could be a criminal offence for Angard and / or Royal Mail and / or you (or any other individuals involved). The test is if there was an intention to induce or reward improper behaviour on the part of the recipient.

Bribery may also involve other criminal offences (for more information about bribery, see the Royal Mail Anti-Bribery Policy to which you will be subject as an Angard employee).

### ***Receiving gifts***

Subject to the permitted exceptions detailed below in the 'Gifts – Exceptions' table, you must not seek or accept any gift from any individual or organisation with which Angard or Royal Mail has dealings. You must not allow any business decision to be influenced by such an offer.

If you are given or offered a gift you must therefore:

- politely return it to the donor or refuse to take it, explaining that Angard policy does not permit its acceptance; and

- notify Angard through the Angard Helpline Number 0333 240 8502 or email [angard.employee@reedglobal.com](mailto:angard.employee@reedglobal.com).

If the offer is accompanied by a suggestion from the donor that something is expected in return, you must provide details of the offer and suggestion through the Angard Helpline Number 0333 240 8502 or email [angard.employee@reedglobal.com](mailto:angard.employee@reedglobal.com) and then follow all advice and instructions you are given. Angard will notify Royal Mail Group Compliance as this could be a bribe. You should also take care that gifts or inducements offered to partners or relatives from an outside source are not intended to influence or compromise your conduct of Royal Mail business whilst on any assignment.

If gifts or inducements are offered in this way, by somebody who has business dealings with Royal Mail, you must let Angard know via the Angard Helpline Number 0333 240 8502 or email [angard.employee@reedglobal.com](mailto:angard.employee@reedglobal.com). You must then follow any advice or instructions you are given. Angard will notify Royal Mail Group Compliance of the gift/inducement.

You will not be entitled to accept such gifts and must instead politely return them to the donor, explaining that the company does not permit the acceptance of such gifts. If you are unable to return the gift you must contact the Angard Helpline Number for further instruction. Under no circumstances should you ever retain such a gift.

### ***Giving gifts***

As an Angard employee you are not permitted to offer or give gifts to persons or organisations outside of Angard in connection with any Angard or Royal Mail business.

### ***Gifts – exceptions***

Type of gift	Comment
<p><b>Low value items</b></p>	<ul style="list-style-type: none"> <li>• You may occasionally accept unsolicited low value items (such as promotional pens, calendars, diaries, notepads or paperweights branded with the giving organisation’s logo, or small gifts, such as chocolates or flowers).</li> <li>• Angard considers ‘low value’ to be a gift actually, or perceived to be of a value of approximately £50 or less.</li> <li>• Multiple gifts (i.e. 3 or more) from or to the same source given on the same or separate occasions over a six month period may not be accepted and you must report them via the Angard Helpline Number 0333 840 25 or email <a href="mailto:angard.employee@reedglobal.com">angard.employee@reedglobal.com</a>.</li> </ul>
<p><b>Christmas tips and gratuities</b></p>	<ul style="list-style-type: none"> <li>• Angard and Royal Mail regard the giving of Christmas tips as a separate matter between customers and individual frontline staff.</li> <li>• However you must not encourage the practice and tips must not be solicited.</li> <li>• Tips must not be accepted if there is any suggestion of an inducement to disclose official information (or information about another customer), or to break any Royal Mail rule. Any such approach must be reported via the Angard Helpline Number 0333 240 8502 or email <a href="mailto:angard.employee@reedglobal.com">angard.employee@reedglobal.com</a></li> </ul>

## **Foreign public officials**

Whilst it is unlikely that Angard employees on assignment to Royal Mail will encounter them, you must not accept any gift from a 'foreign public official' (**FPO**) regardless of its value. Any gift or offer from an FPO must be reported to Angard immediately through the Angard Helpline Number 0333 240 8502 or email [angard.employee@reedglobal.com](mailto:angard.employee@reedglobal.com)

An FPO is anyone holding a legislative, administrative or judicial position, whether appointed or elected, outside the UK; and/or anyone who exercises any public function and/or is an official of a public international organisation (such as the World Bank or United Nations Organisation). FPOs can include employees of state-owned companies and utilities. Therefore, postal workers at foreign postal organisations can be FPOs.

## **Hospitality and entertainment**

Angard employees are unlikely to be offered hospitality and entertainment during assignments with Royal Mail. However, for the avoidance of doubt, you must decline any such offer that is made to you.

## **Sponsorship**

### ***Corporate Sponsorship***

Angard employees on assignment with Royal Mail are not expected to be involved with 'corporate sponsorship'. In this context, 'corporate sponsorship' means partnering with external organisations to deliver mutual benefits through an exchange of monies, products or services. You must make sure that you do not get involved in any corporate sponsorship activity during any assignment with Royal Mail.

### ***Personal Sponsorship***

Additionally, you must not solicit or accept any form of personal sponsorship through Angard or Royal Mail business contacts or offer to sponsor Angard or Royal Mail business contacts in any way.

## **Charitable donations**

You must not make any charitable donations in a way that could suggest they are on behalf of or linked to Royal Mail or Angard. This does not restrict you from making such charitable donations on your own behalf and in your own time.

When money is collected from you in your private and individual capacity for donation to a charity you must take care that the receiving organisation is aware that this is a private donation from you.

Further under no circumstances are you permitted to be involved in making a gift of free or reduced rate postal or associated services to any individual, organisation or charity during any assignment to Royal Mail (the only exception to this rule is the Articles for the Blind service, which is sanctioned by law).

## **Political donations**

Angard operates a strict policy of no political donations, whether financial or in-kind (in particular whilst you are assigned to Royal Mail). The interests of Royal Mail, and those of its customers, must not be compromised by any party political interest or activity. In particular:

- You must not offer in-kind company contributions, such as the free use of company premises, for any political party or organisation which is affiliated with a political party.
- If you engage in the political process, it must be on your own time, and with your own resources.

## **Where to go for further information**

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**Review**

This policy may be reviewed to ensure it remains effective and updated from time to time to meet Angard's requirements.