



GROUP GIFTS & ENTERTAINMENT POLICY

Gifts and entertainment are an important way of developing and maintaining business relationships. However, gifts and entertainment must not place the recipient under any obligation and should not be capable of being misconstrued.

Basis

All the employees of Hill & Smith PLC and its operating companies (the “Group”) and anyone providing services to the Group will abide by this Policy’s principles and request authorisation for gifts and entertainment that are in line with this Policy’s limits and ensure that any gifts or entertainment, whether given or received, accepted, or declined, are properly recorded.

Adoption

This Policy has been adopted by the Group and will be updated or modified as appropriate.

Implementation

The Board of Hill & Smith PLC has overall responsibility for compliance with this Policy. The senior leadership teams of each operating company are responsible for ensuring the employees of their business understand and comply with this Policy.

Principles

The Group is committed to the highest standards of quality, honesty, and accountability and as such we should:

- never offer, pay, solicit, or accept improper or illegal gifts or entertainment in any form, either directly or indirectly or via any third party;
- ensure that any gifts or entertainment, whether given or received, do not exceed the limits set out in this Policy and that such instances are properly recorded, and approved where applicable. This protects you and us from allegations of undue influence;
- carefully consider the timing of any offer of a gift or entertainment, particularly if you are involved in competitive bids, tenders, or contract negotiations to avoid it being misinterpreted;
- ensure that gifts or entertainment must not place the recipient (which maybe you) under any obligation and should not be capable of being misconstrued; and
- ensure that any gifts or entertainment, whether given or received, accepted, or declined, are properly recorded, using the Gifts and Entertainment Register.

Limits on gifts or entertainment given or received

This Policy does not seek to prevent the giving of gifts and entertainment, but to place a responsibility on employees to consider the context in which such gifts and entertainment is offered. The Group acknowledges that entertainment is often an element of a relationship with existing customers, clients or suppliers and future business prospects. Business entertainment could include meals, dinners, sporting events, parties, concerts, and other events where business matters are discussed.

The Policy applies the values in the table below which should be followed when gifts or entertainment is given or received, noting that cash gifts (including vouchers or gift cards) are never acceptable under any circumstance. **Gifts and entertainment should not be offered to or accepted from government/public bodies or officials. If government/public bodies or officials offer gifts or entertainment to employees, they should decline and record the offer in the Gifts & Entertainment Register.**



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Jurisdiction	Not Required to Record in G&E Register	Record in G&E Register	Record in G&E Register + G&E Request for Approval Form required
UK	Below £40	£40 - £150	> £150
US	Below USD \$50	USD \$50 - \$200	USD > \$200
India	Below INR 2,000	INR 2,000 - 5,000	> INR 5,000
Eire	Below €40	€40 - €150	> €150
Australia	Below AUD \$50	AUD \$50 - \$250	> AUD \$250

Reporting

All offers of gifts and entertainment, whether accepted or refused must be recorded and approved as per the values in the table above. The Gifts & Entertainment Register Template and the Gifts & Entertainment Request for Approval Form can both be found in the Group Policies – Helpful Documents section of the H&S Hub. Gifts & Entertainment Registers must be submitted to the relevant Group President quarterly for review (as dictated by Group Financial Control WP6). Gifts & Entertainment Request for Approval Forms require Line Manager approval, or in their absence the Group Company Secretary.

Summary

Sometimes you know what the right thing to do is but sometimes there is an element of doubt. If you are unsure, then ask and remind yourself:

- Does it comply with the Policy and the Group Code of Business Conduct?
- Would I be embarrassed if anyone within or outside of the Group knew about the situation or my actions?
- Could the gift or entertainment be viewed by others as an attempt to influence a business decision?
- Bribes are illegal no matter what the local custom or practice may be – for example in giving expensive gifts or the provision of what may be perceived as lavish entertainment.

Violation

If you become aware of a violation of this policy you should report it either via your Managing Director, Group President or Group Company Secretary, or report using the Group’s online ‘SPEAK UP’ portal, provided by Navex Global EthicsPoint at <https://hsgroup.ethicspoint.com>.

Associated Documents

- Group Code of Business Conduct
- Group Anti-Bribery and Corruption Policy
- Group Whistleblowing Policy
- Gifts & Entertainment Register Template
- Gifts & Entertainment Request for Approval Form

Other Contacts

- Your Managing Director/local Finance Director
- Group Company Secretary Tel: +44 (0)121 704 7430
- Email: compliance@hsgroup.com

Approved by the Board of Directors of Hill & Smith PLC - 8 July 2024