

GIFTS & ENTERTAINMENT GUIDANCE

To be read in conjunction with the ABP Anti-Corruption & Bribery Policy.

These Guidelines apply to the accepting / giving of gifts or hospitality in connection with ABP's business. In all cases, you are required to exercise judgment and give proper consideration to whether any such gift or hospitality is appropriate and proportionate in the particular circumstances, including where the Guidance below states that a gift of hospitality may (on the face of it) be acceptable.

GUIDANCE FOR ACCEPTING / RECEIVING GIFTS	
Apparent value of each individual Gift	
£0-£10	<p>May be accepted.</p> <p>Does not need to be recorded in the Gifts & Entertainment Register.</p>
£10 - £50	<p>May be accepted.</p> <p>Must be recorded in the Gifts & Entertainment Register.</p>
More than £50	<p>Must be:</p> <ul style="list-style-type: none"> • pre-authorised by Line Manager prior to acceptance; and • recorded in the Gifts & Entertainment Register.
More than £100 / non-routine gifts	<p>Must be pre-authorised by:</p> <ul style="list-style-type: none"> • your relevant Regional or Functional Director; or • in the case of a Regional or Functional Director, by the CEO, and in the case of the CEO by the CFO. <p>Must be recorded in the Gifts & Entertainment Register.</p> <p><i>Generally speaking, gifts worth more than £100 are unlikely to be authorised for acceptance, except in exceptional circumstances.</i></p>
General Guidance	
Multiple Gifts	<p>Multiple gifts from same third party over a short period of time should be avoided.</p> <p>If the value of gifts from same third party over the course of a year exceeds £100 then:</p> <ul style="list-style-type: none"> • it should be reported to your Line Manager; and • all gifts should be recorded in the Gifts & Entertainment Register (regardless of value).
Seasonal Gift Baskets	<p>May be accepted - but it is expected that the contents are shared with team members.</p>

	Must be recorded in the Gifts & Entertainment Register.
Examples of Gifts which <u>must not</u> be accepted in any circumstances	<ul style="list-style-type: none"> • Cash • Gift Vouchers • Personal Loans • Airline Tickets • Use of a Holiday Property • Offer of heavily discounted services or works for personal benefit of individual • Offer of a “benefit” which is not generally available to other ABP employees (e.g. a significant discount);
GIVING OR PRESENTATION OF GIFTS BY ABP TO ANY THIRD PARTY	
The same thresholds / guidelines as above apply to the giving or presentation of gifts by ABP to a third party.	

GUIDANCE FOR ACCEPTING / RECEIVING ENTERTAINMENT / HOSPITALITY	
Apparent value per person of meal / entertainment / hospitality event	
£0-£10	<p>May be accepted (e.g. a routine sandwich lunch over a business meeting).</p> <p>Does not need to be recorded in the Gifts & Entertainment Register.</p>
£10-£50	<ul style="list-style-type: none"> • Unless stated below, all meals / hospitality / entertainment worth over £10 per person <u>must be pre-authorized</u> by Line Manager prior to acceptance. • Must be recorded in the Gifts and Entertainment Register. • Pre-authorization is <u>not required</u> for routine business meals (such as lunches and dinners) which are not reasonably expected to exceed £50 per person. Such meals must still be reported in the Gifts and Entertainment Register. <p><i>It is acknowledged that participation in such lunches and dinners is a routine part of maintaining and building important business relationships for ABP. However, employees are still required to consider whether such lunches or dinners have a legitimate business purpose and are appropriate to the relevant circumstances.</i></p>
More than £50	<p>Must be:</p> <ul style="list-style-type: none"> • pre-authorized by Line Manager prior to acceptance; and • recorded in the Gifts and Entertainment Register.
More than £100 / non-routine entertainment / hospitality	<p>Must be pre-authorized by:</p> <ul style="list-style-type: none"> • your relevant Regional or Functional Director; or • in the case of a Regional or Functional Director, by the CEO, and in the case of the CEO by the CFO;

	<p>Must be recorded in the Gifts & Entertainment Register.</p> <p><i>Generally speaking, offers of entertainment / hospitality worth significantly more than £250 are unlikely to be authorised for acceptance, except in exceptional circumstances.</i></p>
More than £1000	<p>In the unlikely case that the cost of the proposed entertainment / hospitality is likely to exceed £1,000 per person, it must be approved in advance by the General Counsel & Company Secretary.</p> <p>If authorised and accepted, it must be recorded in the Gifts and Entertainment Register.</p> <p><i>Generally speaking, entertainment or hospitality in excess of £1,000 per person is unlikely to be acceptable, except in exceptional circumstances.</i></p>
General Guidance	
Multiple entertaining	Multiple entertaining by the same third party over a short period of time should be avoided.
Non-Local Invitations	Any non-local entertainment invitations must be pre-cleared with your relevant Line Manager. The travel and/or hotel portion for any such event must be paid for by ABP unless otherwise approved by your Line Manager.
Invitations where customer / supplier not attending	<ul style="list-style-type: none"> • Unless exceptional circumstances apply, the offer of any hospitality by a third party will not be acceptable unless a representative of the third party is also present <i>i.e. it will generally not be acceptable to accept free tickets for an event, or provision of hospitality without the third party attending.</i> • The same principle applies to the provision of any hospitality by ABP to a third party i.e. it is not acceptable for ABP to provide tickets for any event to a third party unless a representative of ABP is also attending and hosting such hospitality. <p>Must be pre-authorised by:</p> <ul style="list-style-type: none"> • your relevant Regional or Functional Director; or • in the case of a Regional or Functional Director, by the CEO, and in the case of the CEO by the CFO. <p>Must be recorded in the Gifts & Entertainment Register.</p>
ENTERTAINMENT / HOSPITALITY BY ABP TO ANY THIRD PARTY	
The same thresholds / guidelines as above apply to any hospitality / entertainment offered by ABP to a third party.	