

HOSPITALITY & GIFTS (BRIBERY/CORRUPTION) POLICY

Section 1: Purpose

This policy's purpose is to define the measures taken to ensure the giving/receiving of gifts/hospitality don't become an issue within the company.

Section 2: Scope

This document applies throughout USSL and its Supply Chain on all contracts carrying out all services.

Section 3: Introduction

As outlined in the business management system, it is policy of USSL to conduct our business in a professional manner. Therefore, it is a general rule that any employee found to be engaging in acceptance of gifts and hospitality from our business partners, suppliers or other stakeholders will not be tolerated and must be reported.

Section 4: Guidance

In order to protect both staff and the reputation of the USSL from accusations of bribery or corruption, staff are not permitted, directly or indirectly, to accept any gift, hospitality, reward or other benefit from any source (including organisations, other employees and members of the public) with whom he/she has been brought into contact or maintains contact only by reason of the duties for which they are employed by USSL except for:

- Occasional gifts which are regarded as trivial and where the nominal value received by any one person is under £10 e.g. diaries, calendars, pens, cups etc.
- Conventional hospitality (annual dinner of a body with which employees have day-to-day contact or working lunches in the course of official visits), where the frequency and the total cost of hospitality is reasonable and would not be construed by an impartial observer as affecting the employee's judgement regarding the work for which they are employed. It is not possible to define 'reasonable' and employees must use their discretion or seek approval from the Managing Director. In cases of corporate hospitality, it would normally be expected, for example, that any hospitality where the value exceeds £100 be referred for authorisation
- Where a more valuable gift or benefit is offered from which USSL in general might benefit, rather than an individual employee, acceptance will be at the discretion of the Managing Director

Staff responsible for the purchase of supplies, equipment or services must take particular care to ensure that there can be no criticism that unequal treatment has been given to suppliers involved in tendering processes through the acceptance of gifts or other benefits.

Staff should always bear in mind the need not to behave so that the impression might be given that they may be influenced by any gift, benefit or behaviour to show favour or disfavour to any person or organisation in respect of the work for which they are employed. If a member of staff is in any doubt as to the propriety of receiving any gift or hospitality, then the employee must consult the Managing Director.

Employees who are found not to have acted in accordance with the above policy may be disciplined and in serious cases may be dismissed on the grounds of gross misconduct.

Section 5: Control

The control of Hospitality and Gifts will be controlled in the following manner:

- All suspicions of the receipt of Hospitality and Gifts will be investigated by the senior management team
- Spot check of employees belongings will be undertaken (with prior notice) if the receipt of Hospitality and Gifts is suspected.
- Any persons suspected of the receipt of Hospitality and Gifts without prior agreement from the senior management will be immediately suspended from front line operations so as to minimise company risk.
- Where necessary the police will be called in to investigate serious cases.

Section 4: Document History

October 2016	New document
February 2019	Updated with new company branding