



Anti-Bribery Programme

ABP 001

Gifts and Hospitality

March 2018

1.1 Background

discoverIE Group plc (“discoverIE”) is committed to acting with integrity, honesty and fairness in its business activities all over the world. We take a zero-tolerance approach towards bribery and corruption in all its forms by, or of, its employees or any persons or companies acting for it or on its behalf. The Board and senior management are committed to implementing and enforcing effective procedures to prevent bribery and corruption.

discoverIE recognises that bona fide hospitality, gifts, promotional and other similar business expenditure aimed solely to promote the products and services offered by the Group can assist in establishing cordial relations with its business partners and improve image of the Group.

discoverIE however prohibits offering or receiving of disproportionate hospitality, gifts, promotional items and other similar business expenditure which in reality or in perception may be viewed as inducement or reward for improper performance.

1.2 Purpose

The purpose of this policy is to set out discoverIE’s policy and guidance stance on the following:

- Gifts
- Hospitality

This document should be read in conjunction with the **Anti Bribery Programme Handbook**.

1.3 Scope

This policy applies to:

- All discoverIE legal entities worldwide owned directly or indirectly by discoverIE Group plc, including subsidiaries, branches and affiliates;
- All discoverIE employees worldwide; and
- All third parties acting for and behalf of discoverIE, wherever they are located.

1.4 Policy details and guidance

- 1.4.1 Gifts and hospitality should not be offered or accepted by an individual where they may appear to be disproportionately generous or could be perceived as inducement to affect a business decision.
- 1.4.2** A maximum expenditure limit for gift and hospitality per individual must be set (which may vary according to the territory and type of gift and hospitality). **This must be set locally and communicated to all employees.**
- 1.4.3 Frequency of gifts should be taken into account when considering appropriateness of a gift (relatively small gifts and hospitality can accumulate to a large amount if repeated).
- 1.4.4 No gifts or hospitality should be offered or accepted during an active tender process or negotiations with prospective/existing customer or supplier.
- 1.4.5 Reasonableness of gift and hospitality should be taken into consideration when offering or receiving a gift or hospitality (taking into account the seniority of the employee offering or receiving).
- 1.4.6 Identity of the recipient should be taken into consideration when offering or receiving a gift or hospitality (e.g. those in position to award contracts or approve permits).
- 1.4.7 Offer or receipt of travel and accommodation, holidays and use of vehicles for family members of customers/supplier/contractors is prohibited.
- 1.4.8** Details of the gifts/hospitality/sponsorships/charitable contributions offered/received should be logged in the Gift and Hospitality Register (“the Register”), attached at the end of this document. The Register should be maintained and controlled by a nominated employee within each company (the “Anti Bribery Representative”). Each entry in the Register must be by **approved by the nominated authority based on authorisation levels set locally.**

For the avoidance of doubt, where a gift or hospitality is declined, this should also be entered into the Register, including the reason for declining the gift or hospitality.

- 1.4.9 All Corporate Hospitality must have a demonstrable link to the discoverIE’s business.

1.4.10 Always be vigilant of “red flags” noted in the Anti-Bribery Programme Handbook

Red Flags

- Gifts or hospitality received during active tender process or negotiations with existing/prospective customers or suppliers;
- Gifts or hospitality that make individuals uncomfortable;
- Disproportionate gifts or hospitality offered or proposed;
- Items that are likely to cause embarrassment in public domain, or result in adverse publicity for the group;
- Any gift or hospitality irrespective of amount to government officials;
- Any gifts of cash;
- Any gift or hospitality that is paid for personally to avoid having to report or seek approval.

1.4.11 If you have any issues/queries on the policy and guidance please contact your local Anti-Bribery Representative or Group Risk Management team. Please refer to the Anti-Bribery Programme handbook for further details.

Approved by the Board

Nick Jefferies
Group Chief Executive, discoverIE Group plc
March 2018



Gift and Hospitality Register - Received

Company/Division

Code	Date of receipt	Employee name (if received by more than one please state all names)	Name of organization and individuals offering	Description of hospitality or gift	Estimated monetary value	Approver Name	Approver signature (include date)

Code:
HR- Hospitality received GR - Gift Received

Gift and Hospitality Register - Offered

Company/Division

Code	Date of offer	Employee name	Name of organization and individuals receiving	Description of gift, sponsorship, charitable contributions	Estimated monetary value	Approver Name	Approver signature (include date)

Code:

HO- Hospitality Offered GO - Gift Offered SO - Sponsorship Offered CO - Charitable Contribution