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## Gifts and Hospitality Policy

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## Introduction

This Gifts & Hospitality Policy (“Policy”) is issued by VIA Outlets (hereinafter referred to as “VIA Outlets”, “the Company”, “we”, “us”). We value our reputation for lawful and ethical business behaviour and we are committed to maintaining high standards of integrity, transparency and accountability in all that we do. This Policy has been prepared to give clear guidance to everyone within VIA Outlets on their responsibilities in observing and upholding the VIA Outlets position on gifts and hospitality. This Policy should be read in conjunction with VIA Outlets’ Anti-Bribery Policy and the applicable anti-bribery legislation for each jurisdiction.

## Scope and applicability

This Policy applies to all VIA Outlets employees (whether permanent or temporary) and temporary agency workers, trainees or apprentices and directors- together described as (“you”).

This Policy also applies to any third party working on behalf of VIA Outlets (whether permanently or temporarily) who is not an employee, such as (but not limited to) consultants, secondees, agents and intermediaries, contractors and suppliers or other third parties engaged by or representing VIA Outlets (“Business Partners”).

Everyone who is working for or on behalf of VIA Outlets must comply with this Policy and failure to do so may result in disciplinary action against employees, in line with applicable legislation, up to and including termination of employment.

## Gifts and Hospitality

Gifts and hospitality, whether received or given, can be a legitimate part of business. However, everyone must be aware that the giving and receiving of gifts and hospitality may be used or perceived as an opportunity to facilitate bribery.

VIA Outlets strictly prohibits any form of bribery in order to maintain our high standards of transparency and integrity. Especially gifts or hospitality provided by third parties and received by our employees or Business Partners may easily be considered as a bribe, for instance, due to their value, their context or the giver’s or recipient’s position.

VIA Outlets is committed to ensuring that the giving and receiving of gifts and hospitality is transparent and managed and controlled effectively. It is not always easy to decide whether a gift is qualified as inappropriate or not. In the following we therefore want to outline how gifts and hospitality are being handled within our Company.

Gifts or hospitality given or received as part of an existing business relationship are permitted, provided that they are reasonable, within proportionate limits (they should never be lavish or excessive, as further described below) and are given in good faith.

It is highly important that you do not accept gifts or hospitality if you suspect that the business relationship will otherwise be influenced improperly.

## Gifts and Hospitality Log

VIA Outlets has established a Gifts and Hospitality Log where hospitality, gifts and entertainment provided or received by anyone within VIA Outlets must be recorded in case any hospitality, gift or entertainment is not customary (i.e., a cultural gift), or is over an established threshold as agreed from time to time.

Anyone giving or receiving any gifts or hospitality above a retail value of **£100/€115** or the local currency equivalent must record them on the Log. The details to be logged (and to be copied to your Line Manager) will include date received or given, type of gift, entertainment or hospitality, from whom received or to whom given, and the approximate value.

### Gifts

Gifts are understood as any payment, gratification, present or advantage, pecuniary or not, offered, promised, given or received without the expectation of receiving anything in return. Where gifts may appear to be disproportionately generous or could reasonably be construed as an inducement to affect a business decision (e.g. in order to obtain or retain a business or other advantage) should not be accepted. Also gifts in the form of cash or cash equivalent, such as vouchers, should not be accepted.

Any gifts offered (whether accepted or not) which are not of a trivial nature, should be reported to your VIA Responsible Lawyer so they can be added to the Gifts and Hospitality Log. A gift will be considered trivial if it has no material commercial value by virtue of its nature or branding. For instance, this is the case if no unrelated third party would reasonably be expected to purchase the item for a sum in excess of **£100/€115**, or its local currency equivalent.

Any gifts falling outside the definition of trivial or otherwise, within acceptable guidelines under the circumstances, should not be accepted by an individual. There may be occasions when to refuse a gift may cause offence. In case a gift cannot be returned or refused, the gift must be reported to your VIA Responsible Lawyer and included in the Gifts and Hospitality Log, and possibly donated to charity or otherwise agreed with your Line Manager [or, where a Director level or 'Head of' function is concerned, this shall be agreed with the Chief Executive Officer ("CEO")].

Gifts can also create suspicion due to their frequency. If you have already received a gift from any external organisation twice within a single calendar year, you should not accept any further gifts during that calendar year from the same organisation.

### Hospitality

Hospitality is understood as all forms of social amenity, entertainment, travel or lodging, or invitations to a cultural or sporting event. Hospitality, such as meals and entertainment, for customers, brands, suppliers, or business partners may be allowed under certain circumstances. For instance, it can be legitimate to provide hospitality when it supports the legitimate business interests of VIA Outlets and is reasonable and proportionate.

Hospitality may be qualified as reasonable and proportionate when costs are in line with local custom for business-related meals and entertainment and provided that the overall cost does not exceed

**£100/€115** (or the local currency equivalent) per person. Hospitality to be received with a value or estimated value in excess of **£100/€115** per person must be approved by your Line Manager and registered in the Gift and Hospitality Log (or, where a Director level or 'Head of' function is concerned, this must be approved by the CEO, as appropriate). In the following we want to outline how different kinds of hospitality, which may typically occur in the conduct of your daily activities, should be handled.

### **Invitations to lunch or dinner**

Invitations to lunch or dinner from an external organisation should only be accepted where the primary reason for accepting an invitation is to discuss business matters or relevant business training, either with representatives of the hosting organisation or with representatives of other organisations that may have business interests or activities in common with VIA Outlets, and where the venue and hospitality are not in themselves an inducement to accept the invitation or the purpose of the invitation.

### **Invitations to conferences and trade shows**

It is recognised that participation in certain events such as supplier or industry conferences, seminars and trade shows can be of particular value where they support the establishment of relationships with strategic brand partners or suppliers to the business or enhance VIA Outlets' knowledge or understanding of a particular area. For such events, the hospitality element should be incidental to the event and relevant business information is expected to be gained through attendance. For these events, should an invitation to a major sporting or cultural event be included, reference should be made to the section below on invitations of a social kind. Prior written authorisation of your Line Manager should be obtained to accept invitations of this kind (and, where a Director level or 'Head of' function is invited, this should be pre-approved by the CEO, as appropriate) and if they are over the applicable thresholds they should be recorded in the Gifts and Hospitality Log.

### **Invitations of a social kind**

Invitations of a social kind (e.g. sporting and cultural events) are acceptable where the interests of VIA Outlets can be clearly demonstrated in advance and where the business justification is reasonable and the reason for the invitation and the invitee list/process is appropriate.

Hospitality that includes travel or overnight accommodation must not be accepted. The only exception to this rule may be when an employee is speaking at a conference and travel and accommodation is provided by the organisers, and only then with the prior written approval of your Line Manager (or the CEO if a Director level or 'Head of' function is involved).

Where an invitation has been received for multiple or group attendance, prior consent must be sought from the CEO.

In cases of doubt, where you, or a member of staff is concerned about issues relating to the acceptance of hospitality, the matter should first be discussed with your VIA Responsible Lawyer or Head of Legal.

### **Government officials**

There is a heightened sensitivity in the anti-bribery laws and regulations of many countries where government officials are involved and as a result, some countries treat bribery of government officials

more strictly than bribery in the private sector. You should therefore be particularly alert when dealing with government officials.

Any gift or hospitality (no matter how small) to a government official by a VIA Outlets employee or Business Partners acting on behalf of VIA Outlets will require written approval from the CEO to ensure transparency and documented support within the business. This includes charitable contributions or political donations.

## Gifts or hospitality provided by VIA Outlets

Any gifts or hospitality to be provided by VIA Outlets, must be approved by your Line Manager (or by the CEO if a Director level or 'Head of' function is involved), should be of relatively insignificant value and should not be provided with the intention of influencing behaviour or creating a conflict of interest.

Gifts and hospitality should not be in exchange for doing, or promising to do, anything for a customer, brand, supplier, or business partner.

If gifts or hospitality are to be provided, then, subject to prior approval by your Line Manager (or CEO, as appropriate), preference should be given to gifts that may be shared amongst the recipient's team or group of employees. Gifts or discounts offered to a group of employees at VIA Outlets may be accepted and used as intended subject to prior approval by the responsible Line Manager (or CEO, as appropriate).

Examples of acceptable gifts to be provided on behalf of VIA Outlets are:

- fruit hampers
- a notebook
- gifts with local significance such as a ham
- artistic figurines
- pens, bags and umbrellas
- a dinner following a training event

## Getting Help

Your VIA Responsible Lawyer will communicate VIA Outlets' procedure for logging all hospitality, gifts and entertainment provided or received to their teams. All Line Managers must ensure that their teams are both aware of this Policy and their responsibility to act in accordance with it.

Where in doubt, advice can be obtained in confidence from your VIA Responsible Lawyer or the Head of Legal.