

Business Gifts Policy

As a general policy the Company does not believe that giving and receiving gifts is appropriate to the efficient conduct of its business. There are, however, limited exceptions to this policy.

1. Receipt of Gifts

If you are given a gift of any sort by a business contact (e.g., a customer or supplier, whether actual or potential) you must disclose the fact of the gift and its nature to your manager.

If the Company decides that the gift might constitute a bribe or other inducement, it will require you to give the gift to your manager, who will return it to the donor with a suitable covering letter.

In other instances the Company will require you to return the gift to the donor with a polite note explaining the Company policy. All permitted gifts will be pooled for general distribution at an appropriate time. Promotional gifts that are not of significant value, e.g., stationery, are exempt from this policy and need not be disclosed. However, you are reminded that since such gifts are sent only to a limited number of employees they should normally be shared with other employees.

Failure to disclose gifts will constitute a disciplinary offence which will be handled in accordance with the Company's formal Disciplinary Procedure. If the gift in question is of significant value and, for example, the recipient is in a position to influence business dealings with the donor, the offence may be treated as gross misconduct.

2. Giving Gifts

While it is not generally Company policy to offer gifts to suppliers, customers etc., the Company recognises that, on occasions, this may be appropriate, for example, when someone carries out work on a voluntary basis or for a nominal fee, or if a service has been carried out to an exceptional standard.

In such a case, you should put a request in writing to your manager stating:

- whom the gift is for;
- why it should be given;
- the nature of the gift; and
- its approximate value.

If you send gifts which have not been approved in accordance with this procedure you will not be reimbursed for the cost of the gift. In addition, such action may be treated as a disciplinary offence which will be dealt with under the Company's Disciplinary Procedure. You should be aware that senior management may organise marketing and/or Christmas gifts at Christmas and other suitable occasions for distribution as appropriate e.g. Puddings, Mouse Mats, Pens.



Atul Bhagalia
Managing Director

