



Gift & Corporate Hospitality Policy

Introduction

This policy is applicable to all Pure Cold Group Companies

The purpose of this policy is to set out our rules on the giving and receiving of gifts and corporate hospitality in order to protect our reputation and ensure that we operate both lawfully and ethically.

This policy applies to all employees and contractors/consultants/agency workers.

Offering Gifts

You are allowed to offer modest non-cash gifts to business partners where appropriate for marketing purposes or, as long as the gift is occasional and not regular or repeated, other purposes such as expressing thanks or making a goodwill gesture. For example, we may offer promotional material such as pens, calendars, etc. for marketing purposes.

If you want to offer a gift worth more than a nominal amount you must obtain prior approval from a Director who will decide if the proposed gift is legitimate, proportionate and reasonable.

You should never offer:

- cash gifts;
- gifts in secret;
- any sort of gift where the intention is to influence the recipient's judgment;
- any sort of gift where you know that the recipient is not allowed to receive it.

Accepting Gifts

You are allowed to accept token gifts from business partners or potential business partners where this constitutes legitimate and reasonable marketing or where it is a legitimate goodwill gesture. For example, you can accept promotional items such as desk calendars or pens or occasional gestures such as a bunch of flowers from a customer to express thanks or offer congratulations.

You should never accept:

- cash gifts; or
- gifts which are out of proportion with the value of the business relationship; or
- repeated/regular gifts from the same donor; or
- any gift which you are asked to keep secret; or
- any sort of gift where your judgment might reasonably be thought to be at risk of influence as a result of the gift (for example, a gift from a potential business partner shortly before you make a decision over whether or not to award them a contract); or
- any sort of gift which might reasonably bring the business into disrepute or be contrary to terms or the spirit of our equal opportunities/dignity at work policy.

Be aware that a 'gift' includes food, drink and other corporate hospitality if the host is not present. For example, if you are invited to attend a test match at Lords by one of our suppliers but the supplier will not be present then the tickets are a gift.

For those responsible for purchase/procurement of supplies/components, etc - it is prohibited to receive gifts from potential business partners during any kind of active bidding/procurement/negotiation process.

If you are offered a gift in circumstances which make you concerned or uncomfortable then you should raise this with a Director. It is our policy and your responsibility to act ethically at all times.

If any unauthorised gift is offered to you then you should decline it politely explaining that our policy does not permit you to accept it, unless to do so would be embarrassing or insulting (for example because the gift is offered in public) in which case you should accept the gift and then refer the situation to your manager. The company is likely to write to the donor of the gift explaining our policy and return the item.

Gifts and Overseas Travel

If you are travelling overseas on business to an area where gifts are an important part of business culture then you will be allowed and expected to participate in gift giving and receiving, but this still needs to be proportionate and reasonable from a UK perspective. You should seek guidance from a Director.

Corporate Hospitality and Entertainment

Our policy is to participate in corporate hospitality and entertainment where this will promote good relationships with our business partners and is proportionate and appropriate.

For example, attendance at a charity event. In addition, working lunches with business partners are appropriate, as long as they are reasonable.

However, corporate hospitality and entertainment, including attendance at dinners or sporting events, should not be offered or accepted if:

- the estimated value exceeds £1,000; or
- it is lavish or extravagant; or
- it is on a scale which is disproportionate to the legitimate business value of the relationship; or
- you are offering it with the intention of influencing the recipient's judgment or when you know they are not permitted to accept it; or
- you are offered it in circumstances when acceptance would influence your business judgment or put you in a difficult position, for example being offered Wimbledon tickets by a supplier shortly before their contract came up for renewal; or
- if it would infringe our expenses policy; or
- if it might reasonably bring the business into disrepute or contravene the terms or the spirit of our equal opportunities/dignity at work policy.

You should not offer daily cash allowances to individuals as part of any corporate hospitality or entertainment provided by us if this means that we will have no control over the spending of the

allowance. If you are offered any such daily cash allowance by a third party, then please speak to a Director who will offer guidance on what you should do. You may, for example, be required to submit receipts for genuine expenses and to re-imburse the provider for any unused portion of the allowance.

If you are unsure as to whether a particular invitation, event or offer is appropriate, you should seek guidance from a Director.

For those responsible for purchase/procurement of supplies/components etc – it is prohibited to accept any kind of invitation whatsoever during any kind of active bidding/procurement/negotiation process.

Expenses Policy

All claims for business entertaining and gifts are to be submitted in line with the Company expenses policy, and must be accompanied by a valid receipt.

All claims must identify the recipients and the Company for whom they work.

Recording and Disclosing

All invitations to corporate hospitality events and any gift with an estimated value exceeding £100 are to be advised to the finance department.



Mark Isaacs
Company Secretary

1st March 2021