

# HUBFORT

## CHARITABLE CONTRIBUTIONS AND DONATIONS POLICY

<b>Policy Title</b>	Charitable Contributions and Donations Policy
<b>Document Owner</b>	Managing Director, HUBFORT
<b>Applies To</b>	All employees, contractors, directors and agents of HUBFORT
<b>Effective Date</b>	16 April 2026
<b>Version</b>	1.0
<b>Review Cycle</b>	Annual
<b>Jurisdiction</b>	United Kingdom

### 1. Purpose

HUBFORT supports charitable causes as part of its commitment to the communities it serves. This policy ensures that charitable activity is genuine, transparent, and cannot be used as a channel for bribery, tax evasion, or undue influence.

### 2. Scope

This policy applies to all monetary donations, in-kind contributions, sponsored volunteering, and pro bono services provided by HUBFORT or by any individual acting in the company's name.

### 3. Policy Statement

HUBFORT may support registered charities and community organisations whose purposes align with our values. All charitable contributions must be lawful, properly documented, and free from any expectation of commercial advantage.

### 4. Approval Thresholds

- Donations up to £250 per recipient per year: approval by the Managing Director
- Donations between £250 and £1,000: approval by the Managing Director with written justification
- Donations above £1,000: approval by the board
- Multi-year commitments of any size: approval by the board

### 5. Due Diligence

Before any donation is made, the recipient must be verified as follows:

- UK charities: confirmed on the Charity Commission register at [www.gov.uk/charity-commission](http://www.gov.uk/charity-commission)

- Scottish charities: confirmed on the OSCR register
- International recipients: confirmed as a bona fide, lawfully constituted charitable body in their jurisdiction
- The recipient must not appear on UK or international sanctions lists
- The purpose of the donation must be clearly stated and consistent with the charity's published aims

## 6. Prohibited Donations

HUBFORT will not make donations to:

- Organisations where a current client, prospect, public official, or their close family member is a trustee, senior employee, or beneficiary, where the donation could reasonably be perceived as influencing a business decision
- Bodies that discriminate on grounds protected by the Equality Act 2010
- Organisations promoting violence, extremism, or hatred
- Individuals directly, rather than through a registered charity
- Entities that cannot or will not provide a receipt or acknowledgement

## 7. Requests Linked to Business

Any request for a donation that coincides with, or is made by, a party involved in a live tender, contract negotiation, renewal, or procurement process must be declined or deferred until the business decision is concluded. Where there is doubt, the Managing Director decides.

## 8. In-Kind Support and Pro Bono

Donations of cybersecurity assessments, advisory time, or software licences to qualifying charities are permitted under the same approval thresholds, with value estimated at standard commercial rates. Pro bono work must be scoped, documented, and covered by a short agreement protecting both parties.

## 9. Political Neutrality

Donations to political parties, candidates, or campaigns are covered by the Political Contributions Policy and are not treated as charitable giving under this policy.

## 10. Record Keeping

A central register of charitable donations is maintained by Finance, recording recipient, amount, date, approver, due diligence reference, and purpose. Records are retained for a minimum of seven years.

## 11. Tax Treatment

Where eligible, donations are recorded for Corporation Tax relief under the Corporate Gift Aid rules. Donations made with the expectation of commercial benefit do not qualify and must not be claimed.

## 12. Breach

Making, promising, or approving a donation in breach of this policy is a disciplinary matter. Donations used to disguise a bribe are criminal offences under the UK Bribery Act 2010.

## 13. Related Documents

- Anti-Bribery and Corruption Policy
- Political Contributions Policy
- Gifts Policy
- Procurement Policy

## Approval

This policy has been reviewed and approved for release by the undersigned.

Approved By	Role	Date
Syed Ehsan	Managing Director	16 April 2026