

# HUBFORT

## GIFTS POLICY

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| <b>Policy Title</b>   | Gifts 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

Exchanging gifts can be a normal part of business relationships, but gifts can also be used as bribes or create the impression of improper influence. This policy sets out the rules for giving and receiving gifts in connection with HUBFORT's business.

### 2. Scope

This policy applies to all gifts given or received by employees, directors, contractors, and any party acting on behalf of HUBFORT, in any form and of any value.

### 3. Definition

A gift is anything of value given without the expectation of payment. This includes physical items, vouchers, discounts, tickets not tied to a hosted event, loyalty benefits, services, and any transfer of value.

### 4. General Principles

- Gifts must be modest, occasional, and customary for the circumstance
- They must never be given or accepted with the intention of influencing a business decision
- They must be given openly, recorded, and capable of being disclosed to a third party without embarrassment
- Cash and cash equivalents (including gift cards of any amount) must never be given or accepted

## 5. Receiving Gifts

### 5.1 Thresholds

- Under £30 estimated value: may be accepted and recorded in the gifts register
- £30 to £100: line manager approval required and entered in the register
- Over £100: Managing Director approval required; normally declined or returned unless refusal would cause offence
- Where a gift cannot reasonably be returned, it should be donated to a charity nominated by the company, or raffled internally with proceeds to charity

### 5.2 Prohibited Acceptance

Employees must not accept, regardless of value:

- Cash or cash equivalents
- Gifts during a live procurement, tender, or renewal with the giver
- Gifts from a party who is the subject of an ongoing HUBFORT decision (for example, a supplier being evaluated)
- Anonymous gifts or gifts delivered to a home address
- Gifts that could reasonably be perceived as a reward for a specific past or future action

## 6. Giving Gifts

### 6.1 Thresholds

- Under £30 per recipient per year: line manager approval
- £30 to £100: Managing Director approval
- Over £100: board approval
- Any gift to a public official, civil servant, regulator, or employee of a state-owned enterprise, of any value: Managing Director pre-approval with written justification

### 6.2 Appropriate Gifts

- Branded HUBFORT items of nominal value
- Modest seasonal gifts such as a box of chocolates or a bottle of wine at Christmas, within the threshold
- Books relevant to the recipient's professional interest
- A flower arrangement or similar for milestone events

## 7. Public Officials

Gifts to public officials are treated with the highest caution. In many jurisdictions they are strictly prohibited. Before any gift is given to a public official:

- Check the applicable local rules, including the recipient's own acceptance limits
- Obtain Managing Director written approval in advance
- Ensure the gift is modest, openly given, and has a legitimate reason, for example a courtesy gift following a formal visit

## 8. Gifts to Family Members

Gifts to close family members of clients, prospects, public officials, or suppliers are treated as gifts to the individual themselves and fall under the same rules.

## 9. Gifts Register

A central gifts register is maintained by Finance. All gifts given or received must be recorded within five working days, capturing:

- Date and description of the gift
- Giver and recipient names and organisations
- Estimated value
- Reason for the gift
- Approval reference where required

The register is reviewed quarterly by the Managing Director.

## 10. Offered and Declined Gifts

Gifts that are declined should still be logged in the register, with a brief note of why the gift was offered and how it was refused. This creates an audit trail and helps identify patterns.

## 11. Personal Gifts

Gifts exchanged between HUBFORT staff for personal reasons (for example, a wedding gift from colleagues) are outside the scope of this policy provided they are genuinely personal and not funded by the company.

## 12. Breach

Breach of this policy is a disciplinary matter. Giving or accepting a gift with the intention of influencing a business decision is a criminal offence under the UK Bribery Act 2010, with individual penalties of up to ten years' imprisonment and unlimited fines.

## 13. Related Documents

- Anti-Bribery and Corruption Policy
- Entertainment Policy
- Facilitation Payments Policy
- Conflicts of Interest Policy
- Whistleblowing Policy

## Approval

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

| Approved By | Role | Date |
|-------------|------|------|
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| Syed Ehsan | Managing Director | 16 April 2026 |
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