



## PoppyHarp GIFTS AND HOSPITALITY POLICY

### **Overview**

This policy outlines what actions qualify as bribery and identifies those responsible. PoppyHarp is committed to avoiding all forms of corruption and bribery. Our policy aligns with the UK's Bribery Act 2010. This Policy seeks to prevent employees, volunteers, panel members, adjudicators, examiners, and anyone representing PoppyHarp from leveraging their positions for personal advantage, such as accepting gifts or hospitality that could potentially compromise PoppyHarp's integrity or their own judgment and integrity.

### **Aims of this Policy**

Anyone engaged to conduct business on behalf of PoppyHarp should be aware that they are prohibited from using their position for personal gain. The acceptance of gifts and hospitality is an area where perception is more important than fact, no matter that something is accepted with selfless motives and solely in the interests of PoppyHarp, it could be observed as compromising PoppyHarps integrity. This is particularly relevant where PoppyHarp is tendering for products and/or services from third party providers. We strive to maintain unimpeachable standards of honesty, impartiality and integrity in all our business relationships. The intention of this policy is to set out the rules and guidance to be followed to ensure that it can be demonstrated that no undue influence has been applied by any external organisation, or anyone else dealing with PoppyHarp. The contents of this policy are not contractual. PoppyHarp reserves the right to amend this policy, as appropriate, without compensation.

### **Expectation and responsibilities**

Every individual falling under the purview of this policy must acquaint themselves with its terms and adhere to them diligently. It is crucial to maintain a clear record of all instances of offering gifts and hospitality. Individuals should access the most recent version of this policy, accessible via the PoppyHarp website or by contacting Fran Barsby - [info@poppyharp.com](mailto:info@poppyharp.com). Non-compliance may prompt an investigation under PoppyHarps Code of Conduct, for workers, contractors, or other third-party service providers, may result in immediate termination of their engagement.

**PoppyHarp rules and regulations**

All staff, volunteers, panel members and anyone engaged in PoppyHarp employment are prohibited from leveraging their authority or position for personal advantage. It is the responsibility of individuals governed by this policy to maintain a comprehensive record of all offers and gifts. These records should be sent directly to company director Fran Barsby - [info@poppyharp.com](mailto:info@poppyharp.com). This is mandatory whether the gift was accepted or declined.

**Gifts**

Gifts may not be accepted if they seem overly generous or could reasonably be interpreted as an attempt to influence a business decision. If a gift is accepted, the recipient may not always be permitted to keep it. The gift must be reported to Fran Barsby - [info@poppyharp.com](mailto:info@poppyharp.com). If the recipient cannot keep the gift, it should be returned or shared with the team if applicable. Depending on the nature of the gift it could also be raffled for charity. The recipient should ensure that the donor is aware of PoppyHarp's policy on gift acceptance. If there are concerns about accepting a gift or hospitality offer, individuals should contact Fran Barsby for further advice.

**Hospitality**

Invitations to lunch or dinner: from an external organisation may only be accepted where the primary reason for accepting the invitation is to discuss business matters, either with representatives of the hosting organisation or with other parties that may have business interests or activities in common with PoppyHarp 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, festivals and exhibitions: 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 partners or enhance PoppyHarp's profile, 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 cultural or sporting event be included, then this invitation should be declined except where the interests of PoppyHarp can be clearly demonstrated.

Invitations of a social kind e.g. sporting and cultural events should be declined except where the interests of PoppyHarp can be clearly demonstrated in advance and the business justification is both compelling and exceptional. In these circumstances, acceptance must be agreed in advance in writing by Fran Barsby. Hospitality that includes travel and overnight accommodation must not be accepted. The only exception to this rule may be when an individual is speaking at a conference or similar event and travel and accommodation is provided by the organisers, and only then with prior written approval of the Fran Barsby. Repeated invitations are deemed to be inappropriate, and any individual who has accepted hospitality of a social kind from an external organisation should not accept any further invitations of a similar type from the same organisation within the following twelve months.

**Procedure**

Where an offer of a gift or hospitality has been made, the individual receiving the offer should contact Fran Barsby - [info@poppyharp.com](mailto:info@poppyharp.com) .

Any individual concerned with procurement on behalf of PoppyHarp should take particular care. Any offer of a bribe or commission made by external organisations, or anyone else dealing with PoppyHarp, must be reported at once to Fran Barsby - [info@poppyharp.com](mailto:info@poppyharp.com) .

**Update History**

The following changes have been made to this document:

Fran Barsby 28/04/2024