

Gifts and hospitality policy

This gifts and hospitality policy explains the standards and behaviour required of our Board members to comply with the expectations of IPReg and the Bribery Act 2010. It is based on the Anti-corruption and Bribery Policy in the IPReg staff handbook.

ABOUT THIS POLICY

1. It is our policy to conduct all of our business in an honest and ethical manner. We take a zero-tolerance approach to bribery and corruption and are committed to acting professionally, fairly and with integrity in all our regulatory, business dealings and relationships.
2. Any Board member who breaches this policy may have their contract terminated.

WHAT IS BRIBERY?

3. Bribe means a financial or other inducement or reward for action which is illegal, unethical, a breach of trust or improper in any way. Bribes can take the form of money, gifts, loans, fees, hospitality, services, discounts, the award of a contract or any other advantage or benefit.
4. Bribery includes offering, promising, giving, accepting or seeking a bribe.
5. All forms of bribery are strictly prohibited. If you are unsure about whether a particular act constitutes bribery, raise it with the Chief Executive or Chair.
6. Specifically, you must not:
 - (a) give or offer any payment, gift, hospitality or other benefit in the expectation that a business or regulatory advantage will be received in return, or to reward any business received;
 - (b) accept any offer from a third party that you know or suspect is made with the expectation that we will provide a business or regulatory advantage for them or anyone else;
 - (c) give or offer any payment (sometimes called a facilitation payment) to a government official in any country to facilitate or speed up a routine or necessary procedure;
7. You must not threaten or retaliate against another person who has refused to offer or accept a bribe or who has raised concerns about possible bribery or corruption.

GIFTS AND HOSPITALITY

8. This policy does not prohibit the giving or accepting of reasonable and appropriate hospitality for legitimate purposes such as building relationships, maintaining our image or reputation, or explaining our approach to regulatory matters.

9. A gift or hospitality will not be appropriate if it is unduly lavish or extravagant or could be seen as an inducement or reward for any preferential treatment (for example, during contractual negotiations, consideration of an application for registration, an investigation or a tender process).
10. Gifts must be of an appropriate type and value depending on the circumstances and taking account of the reason for the gift. Gifts must not include cash or cash equivalent (such as vouchers) or be given in secret. Gifts must be given in our name, not your name.
11. Promotional gifts of low value such as branded stationery may be given to or accepted from registrants, other regulators, suppliers and business partners.

RECORD-KEEPING

12. You must declare and record on our Gifts and Hospitality Register all hospitality or gifts given or received. You must also submit all expenses claims relating to hospitality, gifts or payments to third parties in accordance with our expenses policy and record the reason for expenditure.
13. All accounts, invoices, and other records relating to dealings with third parties including suppliers and registrants should be prepared with strict accuracy and completeness. Accounts must not be kept “off-book” to facilitate or conceal improper payments.

HOW TO RAISE A CONCERN

14. If you are offered a bribe, or are asked to make one, or if you suspect that any bribery, corruption or other breach of this policy has occurred or may occur, you must notify the Chief Executive or the Chair as soon as possible.
15. We recognise, however, that declining a gift may cause some offence. When considering whether to accept or decline a gift, please use the table below and ensure the correct procedure is followed:

| Benefit received | Procedure |
|---|--|
| Small gift (branded), below £10 (includes diaries, calendars, pens and so on) | Individuals may accept. No recording or approval required |
| Small gift (non-branded), below £10 (includes diaries, calendars, pens and so on) | Individuals may accept. No recording or approval required unless two or more gifts are received within a six-month period in which case notify the CEO |
| Gifts worth £10 or more (includes bottles of wine, champagne, spirits, tokens, vouchers, presents and so on) | All gifts must be recorded and surrendered to the business to be disposed of in one of the following ways: Displayed in the office; Raffled off to allow all employees and Board members to have a chance to benefit – proceeds to be given to charity; Donated to a charity; |

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| | <p>If edible, placed in a break room for everyone to share; Otherwise disposed of in a manner determined by the CEO.</p> |
| <p>Attendance at business functions associated with your role in IPReg or your professional status (that is, professional dinners or events)</p> | <p>Employees: Obtain prior written consent from the CEO (or, in her case, the Chair) and record the attendance.</p> <p>Board members: record the attendance</p> |
| <p>Attendance at purely social events (such as sporting events, horse racing, golf days)</p> | <p>These will normally be regarded as unduly lavish or extravagant and will not be permitted</p> |
| <p>Hospitality accepted (such as lunches, dinners)</p> | <p>Ensure that the hospitality is reasonable, proportionate, not lavish and that the organisation would be willing to reciprocate.</p> <p>For all hospitality accepted the following steps apply:</p> <p>Where the value is less than £150, then it should be reported and recorded.</p> <p>Where the value is between £150 and £300 obtain prior written approval from the CEO or Chair and record.</p> <p>Hospitality with a value of more than £300 will normally be regarded as unduly lavish or extravagant and will not be permitted.</p> |

16. Approvals must be in writing, which may include email. Please notify Kate Hastings of any recordable gifts or hospitality.

[Where and how employees should record receipt of gifts and hospitality.](#)

When determining the monetary value of a benefit you must consider market value. If no monetary value can be placed on a benefit, then consider if accepting it could create a conflict of interest or be perceived to be inappropriate and seek guidance from the CEO.

Please notify all gifts and hospitality (given or received) to Kate Hastings.

[What steps do I take when giving gifts or hospitality?](#)

In general, gifts should not be given to registrants or potential registrants, third parties or anyone outside IPReg. The exceptions to this rule are IPReg-branded products (for example, pens and stationery), modest refreshment and hospitality and celebrations (for example, the conclusion of a project). In determining whether giving a gift is appropriate, consideration should be given to the recipient, the value of the gift and the reason for it. If you are in doubt as to whether a gift or hospitality should be given, please seek advice from the CEO.