

IMC WORLDWIDE GROUP

GIFTS AND HOSPITALITY POLICY

1 ABOUT THIS POLICY

This Policy applies to all employees and suppliers (includes all employees, contractors, consultants and sub-consultants) of The IMC Worldwide Group which includes Aninver (an IMC Worldwide Company) regardless of where in the world they are working at the time. In this Policy, references to "Gifts and Hospitality" apply to goods, services, tickets, awards, food, drink, travel, accommodation, events, special terms, vouchers, favours, honours and any other benefit, tangible or intangible.

It covers Gifts and Hospitality offered by a person or organisation other than IMC and/or Aninver to any of our employees (including teams or groups within IMC and/or Aninver), as well as to Gifts and Hospitality offered by any of our employees to a person or organisation other than IMC and/or Aninver.

If you are unsure about how this Policy should be applied, please speak to your Line Manager or Project Manager.

2 THE POLICY

IMC and Aninver shall maintain an auditable Gift and Hospitality Register ("Register") which will have a record of all offers and acceptances of Gifts and Hospitality to or from IMC and/or Aninver employees which exceed the monetary value and/or frequency guideline limits detailed in section 3. Offers which are declined should also be recorded here.

No IMC or Aninver employee shall offer or accept Gifts or Hospitality without sharing the information with their Line Manager. If any Gifts or Hospitality are offered, the employee should request approval from their Line Manager in advance, if possible.

No one working on an IMC and/or Aninver project (including independent consultants and IMC staff) shall offer or accept Gifts or Hospitality without declaring the information with their Project Manager.

3 THE PROCESS OF DECLARING

There are two different ways to declare the receiving or giving of Gifts and Hospitality, depending on whether you are IMC staff working on a project or an independent consultant, or whether you are IMC staff travelling for reasons non-project related (business development activities etc.).

For IMC and Aninver staff, **including those overseas for business development opportunities**, all Gifts and Hospitality should be agreed, where possible, in advance with your Line Manager. Any instances of Gifts or Hospitality being given or accepted must be declared on the Gifts and Hospitality

Register within **14 days** of the offer. The Register should then be sent directly to the **Finance Director**.

For **external consultants** and **IMC and Aninver staff working on projects**, all gifts and hospitality must be declared immediately (or as soon as is possible) with your Project Manager (PM). The PM will download the Gifts and Hospitality Register from the Intranet, fill this out with the relevant details, and send it directly to the **Finance Director**.

The Register requires you to provide the following details of any gift or hospitality that is declared:

- A full description of the gift or hospitality;
- The value, or an estimated value, of the gift or hospitality;
- The date(s) on which the gift or hospitality was offered and/or provided;
- Details of the other person, company or body making/receiving the offer of the gift or hospitality;
- Details of the (proposed) beneficiary of the gift or hospitality if not the person covered by this Policy;
- Any relationship which the person covered by this Policy or IMC has with the person or body making the offer of the gift or hospitality, including a prospective relationship, for example one under a contract which is still subject to a tender process;
- The reason why the gift or hospitality should be accepted/made; and
- Any breach of this Policy.

It is the responsibility of all IMC UK and Aninver employees to comply with this Policy as amended from time to time. Failure to comply shall constitute a breach of the Policy and may result in disciplinary action being taken in accordance with IMC's disciplinary procedures.

Other related policies:

- Business Ethics Policy
- Whistleblowing Policy

Figure 1 (below) outlines the key steps in the process for both declaring gifts and hospitality. It should be used as a guide, and **not as a substitute** for reading and understanding this policy.

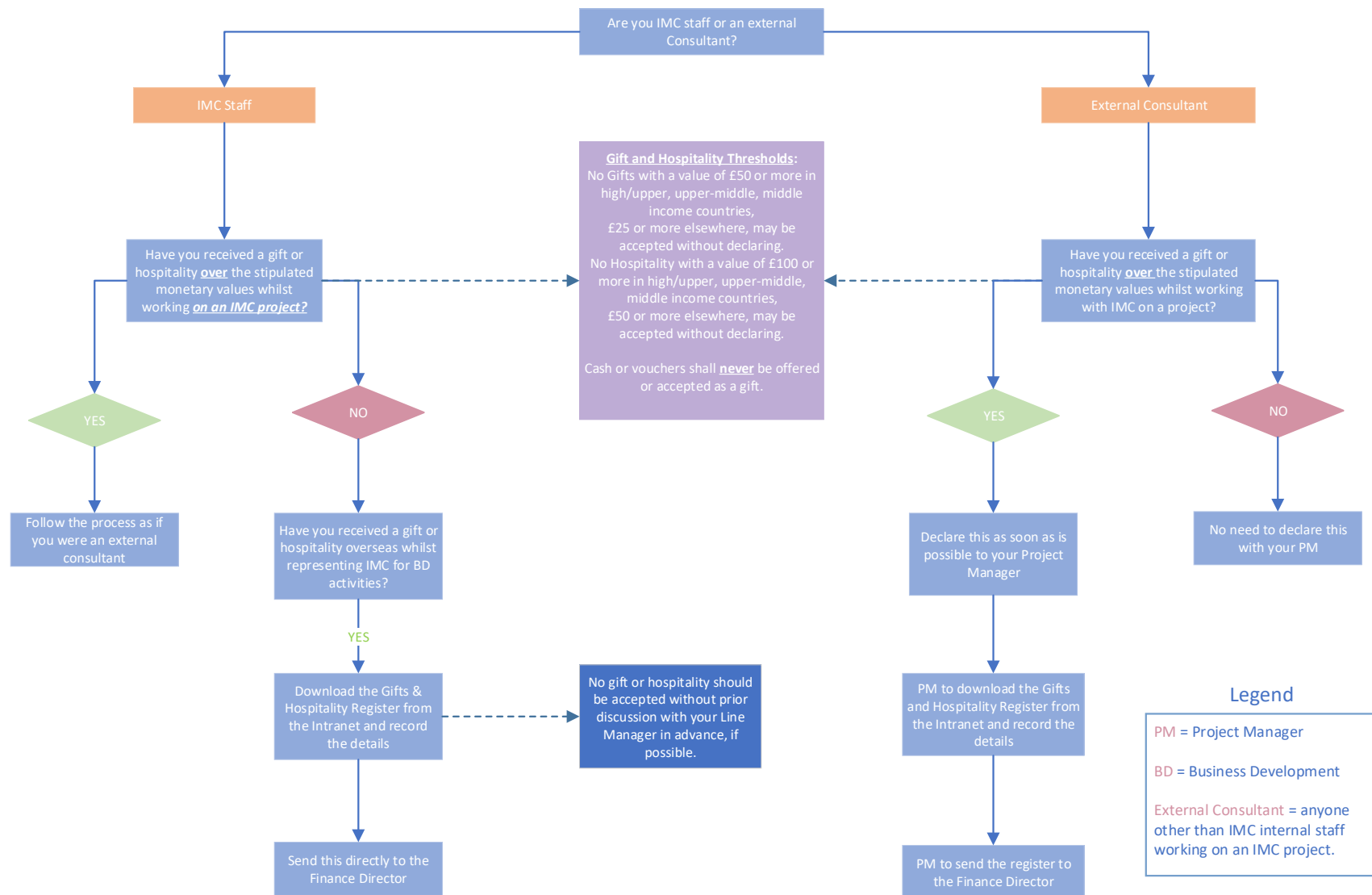


Figure 1: Declaration flow chart

4 GIFT AND HOSPITALITY THRESHOLDS

No gift with a monetary value of ...	£50 or more in high/upper, upper-middle, middle income countries £25 or more elsewhere	...may be accepted without declaring it in the Gift and Hospitality Register.
No hospitality with a monetary value of ...	£100 or more in high/upper, upper-middle, middle income countries £50 or more elsewhere	...may be accepted without declaring it in the Gift and Hospitality Register.

In addition, hospitality should not be accepted from the same source more than once every 6 months unless prior approval is received from the Managing Director.

It is the responsibility of all IMC and Aninver employees to find out the details of the other parties' company policy when offering or responding to offers of Gifts and Hospitality.

Cash or vouchers shall never be offered or accepted as a gift.

IMC and Aninver employees shall always comply with all applicable local laws.

All activities associated with offering or receiving of Gifts or Hospitality shall be open, transparent and fully identifiable by an independent third party.

5 EXCEPTIONS: WHAT MAY BE ACCEPTED WITHOUT DECLARATION?

GIFTS

Provided that the gift is undoubtedly worth less than the relevant value outlined in section 2, and has negligible resale value or onward giving potential, an item which is not money or vouchers, which is relevant to work, and which typically carries the giver's corporate branding may be accepted without being declared.

However, if this kind of gifting happens several times, please see the 'Value and calculation – special cases' section below for implications.

HOSPITALITY

Provided that the hospitality is undoubtedly worth less than the relevant value outlined in section 2 and is either:

- Refreshment provided at, or immediately before or after, a work meeting; or
- A standard form of transport to or from a work meeting; or
- A working meal while carrying out IMC business.

However, if this kind of hospitality is offered several times, please see the 'Value and calculation – special cases' section below for implications.

6 VALUE AND CALCULATION - SPECIAL CASES

Where the gift takes the form of a discount, the value declared should match the actual amount of the discount when it is applied.

Repeated Gifts or Hospitality from the same source within any 6 month period should be grouped together, and, if they total more than the relevant value outlined section 4, they should all be declared.

This does not apply to refreshment provided at work meetings as long as in each instance the refreshment is undoubtedly worth the relevant value outlined in section 4.

In other cases where there is an issue around valuation, please seek advice from an IMC Regional Director.

7 GIFTS AND HOSPITALITY THAT SHOULD BE DECLARED

Any Gifts or Hospitality - other than those which classify as exceptions according to the details above (low value or IMC-wide benefits) - must either be refused or declared. Ideally, they should be declared for approval by a Line Manager or Regional Director **before** the employee chooses to accept. If prior declaration is not possible, employees should be aware that they will still need to get approval after the offer.

The list below contains examples of when Gifts or Hospitality should be declared. Note that this list is for illustration purposes only and does not cover everything. A declaration must be made if:

- the refusal of a gift offered to a IMC employee covered by this Policy, or to any of this employee's close family members, or to any organisation in which the employee has an interest or control, is - or would have been - likely to cause embarrassment;
- a IMC employee covered by this Policy, and/or any of this employee's close family members, is invited to attend a formal social occasion as a representative of IMC (note: All IMC employees covered by this Policy should be particularly cautious of hospitality for any member of their family other than on formal social occasions); where other family members are included, the total value of the benefit for all members should be compared with the above values when deciding if permission is required;
- a IMC employee is invited to attend any seminars and training opportunities where others attending may or may not have had to pay to attend;
- an organiser of a conference or similar event, either within the UK or aboard, offers a IMC employee covered by this Policy any travel tickets and/or accommodation so that they can attend the function as a representative of IMC;
- a working meal which is not undoubtedly below the relevant value outlined in 2.1 in value is offered; or
- gifts (including tickets) which do not fall within the low value exception described above are offered.

8 HOSPITALITY WHICH SHOULD BE ACCEPTED

A person covered by this Policy should not accept any hospitality unless:

- such hospitality is moderate in scale and expense;
- it is in IMC's interests to accept;
- the occasion has a close connection with that person's role at IMC; or
- acceptance of the hospitality could not reasonably be perceived as affecting, or being likely to affect, the way that person acts in relation to the provider of the hospitality.

Accordingly, a person covered by this Policy should not accept hospitality from anyone or any organisation that is tendering, or is about to tender, for any work with IMC and/or Aninver.



Gavin English, Managing Director

