



## **Gifts, Tips & Hospitality Policy**

Greggs' values give a commitment to being open and honest, treating everyone with fairness, consideration and respect. These values underpin our ethical standards, and provide us with guidance as to acceptable behaviours. This policy sets out specific expectations with regard to gifts, tips and hospitality.

### **Scope**

The policy applies to all Greggs' employees.

### **Purpose**

This policy sets out the responsibilities of all staff throughout Greggs to ensure appropriate and consistent handling of any gifts or hospitality which may be offered to them. Adhering to the requirements of this policy will protect staff against potential bribery allegations, and make sure that any benefits are shared in a fair way between colleagues.

### **Company policy**

Under no circumstances should you actively solicit a gift or corporate hospitality. Doing so will result in an investigation being undertaken, which may lead to disciplinary action. Gifts, tips and offers of corporate hospitality must be dealt with in a manner consistent with the details set out below. The policy does not prohibit normal and appropriate hospitality (either given or received), provided it is not excessive, and is properly recorded.

### **Tips**

Our customers may, from time to time, give cash tips may be given in recognition of good service in our shops. All such tips must be put into the Greggs Foundation charity box.

### **Gifts between colleagues**

Personal gifts exchanged between colleagues may be retained by the recipient. This would include gifts to drivers from shops to which they deliver, or gifts to shop teams from their managers.

### **Business gifts**

Suppliers and other companies may give gifts to individuals or departments, particularly at Christmas. Where these are less than £10 in value (e.g. diaries, pens), these may be retained by the recipient. Items such as wine, chocolates etc should be distributed by way of a raffle for staff, with proceeds being donated to the Greggs Foundation, or other appropriate charitable cause.

Should the gift exceed £50 in value, its receipt must be recorded using the Gifts & Hospitality Declaration Form, and forwarded to the Company Secretary at Fernwood. This ensures that Greggs is able to identify companies which regularly make significant donations.

## **Corporate hospitality**

If you are invited to a corporate day or other event, you must seek approval from your Line Manager. This will only be given where the gift or entertainment is reasonable and justifiable. Any such event valued in excess of £50 must be recorded on a Gifts & Hospitality Declaration Form, authorised by your Line Manager and forwarded to Head Office. It is not generally permissible to accept more than one such invitation from any company within a 12 month period.

## **Free business events**

When attending free business events, such as seminars or conferences, the travel and other agreed costs must be met by Greggs. There is an exception in circumstances where you are speaking at the event on behalf of the company – in such cases travel and accommodation costs may be settled by the event organiser, but should be of a level consistent with our own travel and expenses policy. Approval to attend any such events must be sought from your Line Manager.

Attendance at professional institute events undertaken voluntarily during your own time does not require approval, and is encouraged.

## **Donations in respect of gifts or hospitality**

You may wish to consider making a donation to the Greggs Foundation in respect of any gift or hospitality which you receive. There is the opportunity to record this on the Gifts & Hospitality Declaration Form should you elect to do so.

## **Roles and responsibilities**

Every member of staff at Greggs has a personal responsibility to behave in line with our values.

If you become aware of behaviour by one of your colleagues which you believe breaches this policy, you should report your concerns using the company's whistleblowing policy.

Suspected breaches of this policy may be investigated. Any member of staff found to have acted outside the policy will face disciplinary action, and this may result in dismissal.

## **Further guidance**

If you are unsure whether or not your actions are appropriate with regard to gifts or hospitality, you can seek clarification from any of the following:

A Manager from the People team;

A member of the Operating Board;

The Group Internal Audit Manager.

Some examples are provided on the following page which may assist you.

## Examples of the policy in practice

1. A potential supplier offers to pay for travel and accommodation to allow you to visit their factory & ensure that they are able to meet our requirements.
  - Provided the travel and accommodation is within the scope of our expenses policy, this is acceptable. An offer which exceeds our standards should be referred to an Operating Board Director for approval.
2. A long standing supplier pays for a number of tickets to an awards dinner, valued at £300.
  - You must seek approval from your Line Manager before accepting the tickets, and complete a Gifts and Hospitality Declaration Form.
3. You are asked to speak at a conference or participate in a business capacity at a function, with the organiser providing free accommodation for you.
  - This may be accepted, assuming the offer is reasonable (e.g. it would be impractical to travel home after the event).
4. You are sent a large hamper of goods at Christmas, in recognition of your dealings with a key contact over the year.
  - You may accept the hamper, but you should explain to the donor that it will be used as a raffle prize for charity. If it is likely that the hamper's value exceeds £50, the gift must be recorded on a Gifts & Hospitality Declaration Form.
5. A contact from a firm with which you may do business in the course of your role offers to take you out for lunch.
  - This is acceptable, provided the value is not excessive.
6. A current supplier invites you and a guest to a football match.
  - You must seek approval from your Line Manager before accepting. A Gifts & Hospitality Declaration Form must be completed if the value exceeds £50. Where the other guest is non-staff, a donation must be given to the Foundation, equal to the face value of the ticket.



## DECLARATION OF HOSPITALITY / BUSINESS GIFTS

This form should be used to declare any hospitality or business gifts (valued over £50) offered to you, which you intend to accept. Permission to accept any hospitality or gift must be obtained from your Line Manager in advance.

Description of gift or hospitality offered:	
Approximate value:	
Organisation offering the gift or hospitality:	
Date offered:	
Outcome: <i>(delete as appropriate)</i>	Accepted personally / Accepted for raffle
Donation made to Greggs Foundation:	Made / Not made / No comment

Request submitted by:	Name	
	Job title	
	Signature	
	Date	
Request approved by:	Name	
	Job title	
	Signature	
	Date	

Once completed, this form must be returned to the Company Secretary at Fernwood, within 28 days of the offer being approved.