

Bribery Act 2010 Compliance - Hospitality Form

This form is only to be completed where the hospitality is over £75. Gifts are not permitted over £75.

Host of Hospitality (Elior / Client / Supplier / Consultant)	
Hospitality Event details	
Reason for Hospitality	
Date of Event	
Spouse / Partner / Family Member invited? If so, please provide details.	
Overnight / Stay(s) included?	
Air Travel included?	
True Value of Hospitality for all recipients / invitees	
True Value (means market value (not black market value) of the hospitality plus any add-ons, not the actual cost (if any) to the giver/host.)	
Did you ensure that the invitation (where Elior are hosting) was subject to the recipient's own company policies in relation to hospitality?	Yes/No
Tender process underway?	Yes / No If yes, do not accept/receive.

What should you do next?

	Total True Value (for all recipients / invitees)	What next?
Hospitality	Under £75	No approval required
Hospitality	£75 up to £200	Please obtain your Line Manager's consent and forward this form to Elior UK's Legal and Compliance Director for retention with the records.
Hospitality	Over £200	Please obtain your Line Manager's consent and forward this form to Elior UK's Legal and Compliance Director for approval at the next Leadership Team meeting (within the next 4 weeks).
Hospitality	Over £500	Obtain the consent of Elior UK's CEO if Hospitality given or received is: <ul style="list-style-type: none"> • at an Elior UK Stadia client site; • Wimbledon; • Grand Prix; • Chelsea Flower Show; • Lords Cricket Ground. However the value of the Hospitality given or received must never exceed £1 000 (" Permitted Item ") Otherwise only permitted on an exceptional basis with the prior authorisation of Group Elior's CEO (via Elior UK's Legal and Compliance Director).

.....
Colleague Signature

.....
Date

.....
Line Manager Signature

.....
Date

.....
Elior UK's Legal and Compliance Director Signature

.....
Date approval received from the Elior UK Leadership Team (if required)

.....
Elior UK CEO Signature (if Permitted Item)

.....
Date

.....
Elior UK's Legal and Compliance Director Signature

.....
Date approval received from Group Elior CEO (if over £500 and not a Permitted Item)

Appendix 1 - Categorisation of gifts and hospitality

Category	Examples	What you should do
<p>A. Do not accept</p> <p>Generally high value hospitality which might look as if it has been offered to compromise personal judgement and integrity. Any hospitality over £500 in value unless it falls into section B. All financial gifts (money/gift vouchers/discounts)</p>	<ul style="list-style-type: none"> • Membership of or subscription to clubs • Holidays 	<p>Not Accept</p>
<p>B. Can be accepted: If Line Manager approved;</p> <p>If between £200 and £500 and LT approval received.</p> <p>If it relates to the following permitted items (“Permitted Item”), Hospitality given or received at;</p> <ul style="list-style-type: none"> • an Elior UK Stadia Client Site • Wimbledon • Grand Prix • Chelsea Flower Show • Lords Cricket Ground <p>If over £500 and not a Permitted Item, Group Elior CEO approval received.</p>	<ul style="list-style-type: none"> • Supplier conference / educational trips • Food hamper • Tickets to sporting or similar events • An evening meal • Bottle of wine • Flowers • Books • CDs 	<p>Complete the attached Hospitality Form</p> <p>Line Manager approval if over £75 up to £200.</p> <p>Leadership Team approval for £200 and up to £500.</p> <p>Leadership Team approval for any Permitted Item.</p> <p>Group Elior CEO approval if over £500 and not a Permitted Item.</p>
<p>C. Can be accepted and kept by the individual</p> <p>Very low value items (a few £s at the most) such as marketing gifts given out at conferences or pens and note pads given out on training courses.</p>	<ul style="list-style-type: none"> • Working lunches and other low value refreshments • Pens • Key rings • Mugs • Note pads • Diaries 	<p>Nothing, their receipt/gifting does not need to be included in the hospitality register and therefore does not need a Hospitality Form to be completed.</p>