

## Gifts and Hospitality (G&H) Policy

---

### Introduction

1.1 By exchanging gifts and entertainment can create goodwill and establishes trust in relationships with counterparties and other business partners. It is important, however, that the guidelines set out below are followed in all cases.

1.2 This document outlines the approval process for giving and receiving gifts, hospitality, sponsorships and charitable donations. This Process should be read in conjunction with the Anti-Bribery & Corruption Policy<sup>1</sup>.

### Scope

---

2.1 This process applies to EV Cargo<sup>2</sup> employees as outlined and defined in the Anti-Bribery and Corruption Policy.

### When are gifts and hospitality are prohibited?

---

3.1 Offering or receiving a gift or hospitality is prohibited at critical periods when important business decisions are made. For example, during a bidding/tender process, before a contract is signed, when a contract is renegotiated, and when a claim occurs.

### Approval requirements<sup>3</sup>

---

4.1 CEO pre-approval is required with regards to the following:

#### 4.1.1 Public Officials

Any gift or hospitality of any value offered to or by a Public Official, with exception of modest refreshments offered in connection with a business meeting and items of nominal value, such as cups and pens etc. that bear the company logo.

4.1.2 Public Officials include, but are not limited to the following:

- a. Public or government officials, agents, employees, or representatives;
- b. Any political party or political party officials, agents, employees or representatives;
- c. Candidates for public or political party office;
- d. Members of public assemblies;
- e. Officials and employees of international organisations (e.g. the United Nations, the World Bank or the IMF);
- f. Judges or officials of international courts; and

---

<sup>1</sup> Please read the anti-bribery & corruption policy.

<sup>2</sup> EV Cargo refers to the entirety of EV Cargo Group within the United Kingdom and Global Network.

<sup>3</sup> For ease, please use flow chart on page 4 in conjunction with this process.

- g. Government controlled administrations' and state-owned companies' employees.

#### 4.1.3 Sponsorships & charitable donations

Sponsorships and charitable donations include, but are not limited to the following:

- a. Any activity in exchange for advertising
- b. Charitable donations to support a recognised national charity event
- c. Financial contributions to the cost of an activity or an event

#### 4.1.4 Monetary thresholds

Gifts – Any gift given or received that exceeds £50 per individual.

#### 4.1.5 Hospitality

All hospitality given or received that exceeds £100 per individual.

Hospitality must only be offered or received where there is a direct link to working arrangements and a genuine business reason can be demonstrated.

#### 4.1.5 Corporate Hospitality

Hospitality that exceeds £2000 or the equivalent in other currencies.

Please Note: Meals offered for visiting business partners should be limited to a maximum of one in every 2 days of the visit.

### **Approval process**

---

5.1 The Declaration & Approval Form contained in [Appendix 1](#) must be completed by the member of staff that is giving or receiving the gift or hospitality. Once it has been approved by their manager, it must then be sent to the CEO for approval.

5.1.1 The CEO may:

- a. Approve the request in its entirety
- b. Approve subject to conditions/limitations
- c. Reject

5.1.2 All Approval forms that have been approved by the CEO are to be filed with the Ethical Trade officer. (Once the gift/hospitality has been approved a copy of the form must be sent to the Ethical Trading manager).

### **Frequency**

---

6.1 The giving and acceptance of gifts and hospitality should be occasional. Multiple gifts/hospitality to and/or from the same third party is limited to a maximum of 4 times in a calendar year.

### **Collective approvals of gifts**

---

7.1 Where collective/bulk approvals are required for gifts given to multiple customers, for example at Christmas, please complete Appendix 2, which is a simplified version of the Declaration & Approval Form.

### **Audits**

---

8.1 Periodic audits will be performed by the Ethical Trading Manager to ensure compliance with the Policy and Process.

### **Record keeping**

---

9.1 The Ethical Trading manager will maintain a record of all Approvals.

### **Responsibility for policy**

---

10.1. EV Cargo Sustainability Committee has responsibility for endorsement of policies impacting the sustainability strategy.

10.2. The Sustainability Committee will oversee the work of EV Cargo Ethical Trade Manager and any individuals to whom particular compliance roles and/or responsibilities have been designated.

10.3. The Operating Boards of each business within EV Cargo will have responsibility for effectively implementing the policy and will report any matter relating to violation of the policy to the Sustainability Committee and if of a material nature, the board of EV Cargo.

10.4. The policy will be formally reviewed by the Sustainability Committee on an annual basis and monitored regularly by EV Cargo Ethical Trade Manager (in particular, in response to any material changes to relevant law and procedural guidance), in order to ensure that it is appropriate, adequate and effective. Any necessary improvements identified will be implemented immediately and communicated to all EV Cargo Staff.

10.5. Employees and any Associated Persons of EV Cargo who are required to comply with the terms of the policy will be advised of any key changes which are made.

### **Speaking out (It's ok to say)**

---

11.1. In order to provide an effective channel for reports of misconduct, EV Cargo has a dedicated online confidential Whistleblowing reporting tool/hotline via EthicsPoint, this can be accessed by following this link <https://secure.ethicspoint.eu/domain/media/en/gui/106419/index.html>. Our global colleagues also have access to the EthicsPoint hotline. Simple guidance can be followed to report any misconduct.

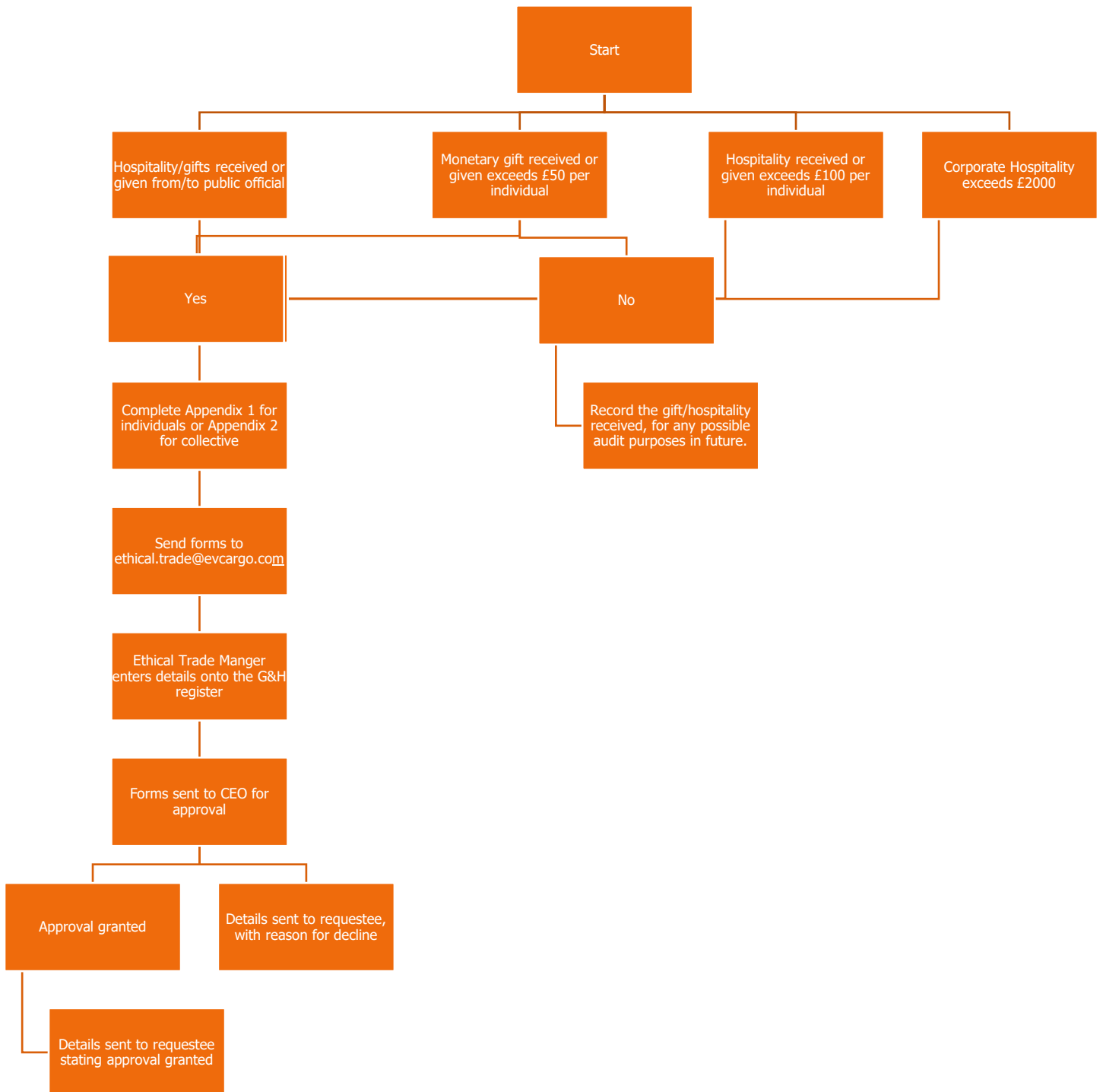
### **Useful contact information:**

---

12.1. The Ethical Trading Manager/Compliance has direct feed into the Chief Sustainability Officer of EV Cargo, who has direct links to the CEO of EV Cargo. If you have any concerns and you want to speak out, please use the contact numbers below or EthicsPoint. Your details will remain anonymous, unless expressed otherwise. Remember; it is ok to say.

Ethical Trading Manager

Email: [ethical.trade@evcargo.com](mailto:ethical.trade@evcargo.com)



Audits will be carried out throughout the year by finance and the Ethical Trade Manager.