



## Design / Fabrication Specialists in Structural and Architectural Projects

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# GIFTS & ENTERTAINMENT POLICY

## 1 GENERAL PRINCIPLES

Kent Structural & Architectural Ltd ( KSA ) expects the highest standards of integrity and conduct from its employees in all matters affecting the company. Employees should apply the principles of this policy at all times. Failure to comply with this policy may result in disciplinary action, up to summary dismissal for gross misconduct.

## 2 GIFTS AND ENTERTAINMENT

The giving and receiving of gifts and entertainment can establish and reinforce goodwill. However some gifts and entertainment can secure (or appear to secure) improper influence and might even be seen as bribes attracting criminal liability the implications of which can be very serious both for KSA, the company and individuals involved. See KSA Policy on Bribery and Corruption.

“Gifts and entertainment” includes all products or services, business courtesies, gratuities, meals, drinks, discounts, hospitality, entertainment, recreation, tickets, transportation and other “things of value” (thereby excluding courtesies and gratuities of minimal value such as small promotional items, diaries, calendars, etc.) for which the recipient does not pay the fair value.

## 3 GOVERNMENT AGENCIES

Most countries have their own specific and very strict rules governing the acceptance of gifts and favours by government officials, employees and consultants. The offering of gifts and favours including travel, accommodation or daily expenses (directly or through intermediaries) to government employees and consultants, including the attempt to do so, is a criminal offence in most countries and subject to severe penalties. KSA policy prohibits the giving of all kinds of gifts, gratuities, courtesies, entertainment or favours to employees, officials and consultants and their immediate families of any governmental units , world-wide without the prior approval of the Managing Director of KSA. Please see the Policy on Bribery and Corruption in respect of facilitation payments.

## 4 GIFTS AND ENTERTAINMENT - SOME GUIDING PRINCIPLES

KSA employees must not accept, offer, procure or encourage the giving or receipt of gifts or entertainment between KSA employees (or their close family) and employees (or close family members) of organisations with which the KSA employee has or may have business

The following are never permissible:

Any gift or entertainment that is in breach of relevant laws, regulations or customs;

Any gift or entertainment which might be linked (or appear to be linked) to a competitive procurement or bidding process.

Any entertainment that is indecent, sexually oriented or which might tarnish KSA reputation;

Any gift of cash or cash equivalent.

If there is any doubt as to whether any particular gift or entertainment is permissible, prior approval must be received the Directors.

## **5 BRIBES AND “KICK-BACKS”**

See KSA Policy on Bribery and Corruption. Prohibited payments include rebates, commissions and “kick-backs” to third parties or intermediaries where the recipient or payee is not clearly the provider of the service, as well as “consultancy fees” and other such payments where the value to the company making the payment cannot be legitimately demonstrated. Breach of this Policy will result in disciplinary action up to and including summary dismissal.

## **6 IMPERMISSIBLE GIFTS**

You must immediately return (and report) any gift of cash or cash equivalent.

Gifts received by which are not permitted by this policy may be retained initially if it would be insulting to reject or return it but this must be reported immediately to your Director who will then decide what action should be taken.

## **7 EMPLOYEE RESPONSIBILITY**

Protecting KSA reputation is every employee’s responsibility. Employees should therefore immediately report suspected violations of the law or of this policy, they will not suffer any adverse company action when doing so, and the matter will be dealt with in the strictest possible confidence.

## **8 COMPLIANCE**

Compliance with this Policy will be treated in the same manner as other KSA policies. All Managing Directors will be required to sign a statement each year

acknowledging their receipt of a copy of this Policy; their dissemination of the Policy to their direct reports; and their disclosure of any known violations of the Policy, to the extent not previously reported as required under the Policy.

**This policy and compliance with it will be the subject of review as part of the KSA Internal Audit Programme.**

Managing Director : **Paul Hankin**

**Date : 02/01/2013**

**Signature:**

