

Angard Staffing

Gifts and Hospitality Policy

Angard Staffing is committed to ensuring that all employees are provided with clear guidance on the giving and receiving of gifts and hospitality, to support compliance with the UK Bribery Act 2010.

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Overview

This guide sets out Angard Staffing (Angard)'s policy regarding the offer and acceptance of gifts and hospitality by Angard employees. It applies to all employees working for Angard and, in particular, during any assignment to Royal Mail.

Any breach of this policy, or associated procedure, will be treated as a serious matter by Angard.

Breaches may result in disciplinary action, including termination of employment and reporting to the appropriate authorities. In serious cases, where it is found that an individual has accepted or offered a bribe, this may result in criminal penalties.

Definition of gifts and hospitality

A gift can include anything of value, whether financial or non-financial, such as cash, vouchers, loans, or sponsorship.

It may also consist of goods or services provided free of charge, at a discounted rate, or under preferential terms that give an advantage to Angard employees in their role.

Hospitality and entertainment involve the provision of food, drinks and/or entertainment offered either free or at a reduced cost, whether during or outside of working hours and on or off company premises.

Any gift, hospitality, or entertainment that is not properly assessed and approved may be considered an improper advantage and could constitute, or appear to constitute, bribery.

Bribery and money laundering

What is bribery?

Bribery involves offering, promising, requesting, or accepting an advantage, either directly or through a third party in order to encourage or reward improper behaviour (such as actions that are illegal, unethical, or in breach of duty).

An “advantage” refers to any benefit or item of value, whether real or perceived. This can be financial or non-financial and may include anything that holds value for the recipient, or someone connected to them, such as a friend or relative.

Examples include cash, loans, donations (including charitable contributions), awarding business, job opportunities, preferential treatment, holidays, or gifts and hospitality.

Bribery is strictly prohibited at Angard. You must not offer, give, request, or accept a bribe under any circumstances. Even the exchange of gifts or hospitality may be considered bribery if it is intended to influence behaviour.

Any activity identified as bribery may constitute a criminal offence for Angard, Royal Mail, and/or the individuals involved. The key consideration is whether there is an intention to influence or reward improper conduct.

Bribery may also be linked to other criminal offences. For further guidance, refer to ‘**Where to go for further information section**’, which directs you to relevant policies.

What is money laundering?

Money laundering is the process whereby money generated by criminal activity, like drug trafficking, appears to have come from a legitimate source (usually because someone has falsified accounts).

Money laundering is illegal and so are the activities it tries to hide.

You must never engage in or help anyone else to engage in money laundering or terrorist financing.

If you know or suspect that bribery, money laundering or terrorist financing is taking place, you should contact the Angard Helpline Number 0333 240 8502 or email hr@angardstaffing.co.uk

Gifts and hospitality

Receiving gifts

Subject to the permitted exceptions detailed below in the '**Gifts – Exceptions**' table, you must not seek or accept any gift from any individual or organisation with which Angard or Royal Mail has dealings. You must not allow any business decision to be influenced by such an offer.

If you are given or offered a gift you must therefore:

- politely return it to the donor or refuse to take it, explaining that Angard policy does not permit its acceptance; and
- notify Angard through the Angard Helpline Number 0333 240 8502 or email hr@angardstaffing.co.uk

If the offer is accompanied by a suggestion from the donor that something is expected in return, you must provide details of the offer and suggestion through the Angard Helpline Number 0333 240 8502 or email hr@angardstaffing.co.uk and then follow all advice and instructions you are given.

Angard will notify Royal Mail Group Compliance as this could be a bribe.

You should also take care that gifts or inducements offered to partners or relatives from an outside source are not intended to influence or compromise your conduct of Royal Mail business whilst on any assignment.

If gifts or inducements are offered in this way, by somebody who has business dealings with Royal Mail, you must notify Angard via the Angard Helpline Number 0333 240 8502 or email hr@angardstaffing.co.uk

You must then follow any advice or instructions you are given. Angard will notify Royal Mail Group Compliance of the gift/inducement.

You will not be entitled to accept such gifts and must instead politely return them to the donor, explaining that the company does not permit the acceptance of such gifts.

If you are unable to return the gift you must contact the Angard Helpline Number for further instruction. Under no circumstances should you ever retain such a gift.

Giving gifts

As an Angard employee you are not permitted to offer or give gifts to persons or organisations outside of Angard in connection with any Angard or Royal Mail business.

Gifts – exceptions

Type of gift	Comment
Low value items	• You may occasionally accept unsolicited low volume of items (such as promotional pens, calendars, diaries, notepads or paperweights branded with the giving organisation's logo, or small gifts, such as chocolate or flowers) • Angard considers 'low value' to be a gift actually or perceived to be of a value of approximately £50 or less. • Multiple gifts (i.e. 3 or more) from or to the same source given on the same or separate occasions over a six-month period may not be accepted and you must report them via the Angard Helpline Number or email hr@angardstaffing.co.uk

Christmas tips and gratuities	• Angard and Royal Mail regard the giving of Christmas tips as a separate matter between customers and individual frontline staff. • However, you must not encourage the practice and tips must not be solicited. • Tips must not be accepted if there is any suggestion of an inducement to disclose official information (or information about another customer), or to break any Royal Mail rule. Any such approach must be reported via the Angard Helpline or email hr@angardstaffing.co.uk
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Foreign public officials

Whilst it is unlikely that Angard employees on assignment to Royal Mail will encounter them, you must not accept any gift from a 'foreign public official' (**FPO**) regardless of its value.

Any gift or offer from an FPO must be reported to Angard immediately through the Angard Helpline Number 0333 240 8502 or email hr@angardstaffing.co.uk

An FPO is anyone holding a legislative, administrative or judicial position, whether appointed or elected, outside the UK; and/or anyone who exercises any public function and/or is an official of a public international organisation (such as the World Bank or United Nations Organisation). FPOs can include employees of state-owned companies and utilities. Therefore, postal workers at foreign postal organisations can be FPOs.

Hospitality and entertainment

Angard employees are unlikely to be offered hospitality and entertainment during assignments with Royal Mail. However, for the avoidance of doubt, you must decline any such offer that is made to you.

Sponsorship

Corporate Sponsorship

Angard employees on assignment with Royal Mail are not expected to be involved with 'corporate sponsorship'. In this context, 'corporate sponsorship' means partnering with external organisations to deliver mutual benefits through an exchange of monies, products or services. You must make sure that you do not get involved in any corporate sponsorship activity during any assignment with Royal Mail.

Personal Sponsorship

Additionally, you must not solicit or accept any form of personal sponsorship through Angard or Royal Mail business contacts or offer to sponsor Angard or Royal Mail business contacts in any way.

Charitable donations

You must not make any charitable donations in a way that could suggest they are on behalf of or linked to Royal Mail or Angard. This does not restrict you from making such charitable donations on your own behalf and in your own time.

When money is collected from you in your private and individual capacity for donation to a charity you must take care that the receiving organisation is aware that this is a private donation from you.

Further under no circumstances are you permitted to be involved in making a gift of free or reduced rate postal or associated services to any individual, organisation or charity during any assignment to Royal Mail (the only exception to this rule is the Articles for the Blind service, which is sanctioned by law).

Political donations

Angard operates a strict policy of no political donations, whether financial or in-kind (in particular whilst you are assigned to Royal Mail). The interests of Royal Mail, and those of its customers, must not be compromised by any party-political interest or activity.

In particular:

- You must not offer in-kind company contributions, such as the free use of company premises, for any political party or organisation which is affiliated with a political party.
- If you engage in the political process, it must be on your own time, and with your own resources.

Where to go for further information

Contact the Angard Helpline Number on 0333 240 8502 or email hr@angardstaffing.co.uk if you have any queries about this policy.

For web access please go to: www.angardstaffing.co.uk

In the event of any inconsistency between this policy and the supporting guides, the terms of this policy take precedence.

Related documents

You may wish to refer to the following documents alongside this policy. Copies can be requested via the Angard Helpline on 0333 240 8502 or by emailing hr@angardstaffing.co.uk

Please note that some of these are Royal Mail policies, which you are required to follow during any assignment.

- Ethical Business Conduct Policy
- Conflict of Interest
- Code of Business Standards

Review

This policy may be reviewed to ensure it remains effective and updated from time to time to meet Angard's requirements.

Last review date: 23rd June 2026