



Orbis Advisory has a zero tolerance approach to bribery and corruption and fraudulent activity of any kind. We acknowledge the fact that gifts and hospitality given or received by employees, suppliers and business partners are part of normal business activity. This policy and statement are intended to form the framework which governs our business operations.

Our staff are prohibited from offering, soliciting or accepting any gift/hospitality which could reasonably be deemed likely to influence any future business decision. We operate a business culture where fraudulent activity of any kind is not tolerated.

Orbis Advisory recognises and accepts that the occasional offer/acceptance of a modest gift/hospitality can make a contribution to the development of good business relationships. However, all decisions on what constitutes a modest gift/hospitality is to be escalated by all staff to the Director.

As general guidance, the newspaper headline test should be adopted, i.e. "Would I be comfortable if the facts of this gift or hospitality were made public in a trade magazine or local newspaper?" If the response is anything other than "perfectly comfortable" then the activity should stop immediately.

The following requirements shall be met by all staff:

- No member of Orbis Advisory staff shall offer or accept gifts/hospitality in isolation or in secret from relevant colleagues and/or their line manager.
- The monetary value of an acceptable modest gift shall be identified and made known to relevant staff by the Director. It shall not generally exceed 0.25% of the national average wage paid within the relevant region or country. (NB This is approximately £26,000 in the UK according to the Office for National Statistics UK Labour Market Bulletin June 2016, meaning an indicative gift value threshold of approximately £65.)
- The monetary value and frequency of an acceptable offer or receipt of hospitality shall be identified and made known to staff by the Director. The monetary value shall not generally exceed 1% of the national average wage paid within the relevant region or country (c.£260 for the UK in 2016). Additionally, it shall not exceed the maximum frequency of occurrence as set by the Board.
- The business shall maintain an auditable gift/hospitality register, which a designated Board member shall be advised of and record all offers and acceptances of gifts and hospitality to our staff who are not Directors and which breach the monetary value and/or frequency guideline limits detailed above.
- All staff shall take full account of the other parties' company policy when offering or responding to offers of gifts and hospitality.
- Cash or vouchers shall never be offered or accepted as a gift.
- All staff shall always comply with all applicable local laws.
- All activities associated with offering or receiving of gifts/hospitality shall be open, transparent and fully identifiable by an independent third party.

Signed:

Rupert Clark-Lowes  
Director

Date: 22<sup>nd</sup> May 2019