

# Gifts & Hospitality Policy

## 1. What are offers of gifts and hospitality?

We define gifts and hospitality as:

- anything of value, offered to you for free or at a discounted rate from an external third party
- anything of value, offered by you for free or at a discounted rate, to an external third party

Everyone working for or on behalf of Network Rail has a duty to declare and manage offers of gifts and hospitality. If these aren't handled correctly, it could look like an attempt to influence our decision making and, in some instances, could even be seen as a bribe.

The policy doesn't cover instances where gifts are exchanged between colleagues (such as birthday presents or leaving gifts). However, some of the principles detailed below around timing, value, and perception should still be considered.

## 2. When can I accept an offer of a gift or hospitality?

Accepting (or offering) gifts and hospitality can help to develop working relationships, but it's important to do so responsibly and remember Network Rail's status as an arm's length body of government.

To help you decide if you should accept or offer a gift or hospitality – regardless of value – ask yourself the following questions:

- **Is there a clear business reason?** – there should be a justifiable business benefit rather than it simply being for personal gain
- **Is the offer modest in value and proportionate?**
- **Is the offer timed appropriately?** – offers shouldn't be timed to coincide with business decisions being made such as tender exercises or contract renewals.
- **What are the intentions behind the offer?** – could accepting an offer influence, or appear to influence, any business decisions being made? Are frequent offers being made by the same supplier?
- **How would the situation look to the outside world?** How could this be perceived by your colleagues, suppliers, the media, and the public?

## 3. What offers are considered off-limits?

There are some categories of gifts and hospitality that wouldn't be considered appropriate to accept (or offer) under any circumstances.

Offers that meet any of the criteria below should be registered on iEthics and politely declined:

- sporting events, even if in a charitable or team-building context
- any travel or accommodation. If you have a genuine business need to attend or stay overnight, Network Rail should meet all the costs involved (see the [Business Travel and Expenses policy](#) for more information)
- cash, cash equivalents (such as gift vouchers), or loans
- anything involving your partner or family members (except for the annual Railway Ball)
- personal services (such as use of another company's vehicles, use of holiday homes, home improvements, or personal discounts)
- anything where the person offering the gift or hospitality is not present.

#### **4. How to declare offers of gifts and hospitality**

**Any offer, whether giving or receiving, with an estimated value of £25 or more should be declared on iEthics regardless of whether it's accepted.**

In these instances, you should:

- Discuss the situation with your line manager
- Make a declaration on iEthics (found on your Oracle eBusiness account) which your line manager will be required to approve or reject

The Ethics team will conduct spot checks on the declarations and associated mitigating steps and provide advice or challenge where necessary. Any breaches of the policy and high value offers will be included in periodic reporting.

#### **5. What about charitable donations?**

Seeking sponsorship or charitable donations doesn't strictly fall within the definition of this policy, however, asking a supplier or business partner to donate to a cause (monetary or otherwise) can create feelings of obligation or awkwardness and can look inappropriate to the outside world, particularly if the company is competing for our business.

For these reasons, we don't advise asking for donations from external organisations and suggest that any links to donation pages are removed from emails sent externally. Instead, we recommend approaching your colleagues for donations and sponsorship.

For more information or questions about organising charity events or for guidance on what to do if you're offered a donation without having requested it, take a look at the [Ethical Guide to Charity Events](#) or contact [CharitableGiving@networkrail.co.uk](mailto:CharitableGiving@networkrail.co.uk).

## 6. Are there any exemptions?

Where it's culturally inappropriate to decline an offer of a gift or hospitality, you may accept it as long as you're confident that it doesn't appear to place you under any obligation or compromise your impartiality. This should be logged on iEthics and you and your manager should consider what to do next if the offer is deemed to be lavish (for example, you could give it to charity).

Similarly, in some cultures, you may be expected to offer a gift. In these cases, you can offer a token gift of modest value.

Any exemptions outside of this would require both line manager and functional director sign off. We'd also expect you to contact the Ethics team to discuss before proceeding.

## 7. Policy breaches

Everyone at Network Rail has a responsibility to raise genuine concerns about suspected wrongdoing taking place in Network Rail, so if you're worried about a potential breach of this policy, you must speak out. Our Speak Out service can be accessed online [here](#) or by calling the 24/7 hotline **0808 143 0100**. Alternatively, you can contact the Ethics team by emailing [ethics@networkrail.co.uk](mailto:ethics@networkrail.co.uk)

We will investigate any suspected breach of this policy thoroughly and impartially. Employees found to be in breach

of this policy may be subject to disciplinary action which may ultimately result in their dismissal.

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