

## Air Business Policy on Gifts, Entertainment and Sponsorship

**Approved by Adam Sherman, Managing Director, 19<sup>th</sup> March 2009**

**Issued by Philip Ions, Company Secretary, 19<sup>th</sup> March 2009**

### 1. DEFINITION

- (i). In this context, gift is broadly defined as anything that is given to staff, either as a result of a relationship with a particular party or because the member of staff is a public figure and for which the recipient staff member does not pay fair market value.
- (ii). Gifts offered by personnel of different organisations differ widely and may include material goods, services, promotional premiums, travel and accommodation for business or vacation purposes, tickets to sporting or cultural events and on-going discounts not generally or readily available to the public at large.

### 2. RECEIVING GIFTS

- (i). Staff are responsible for ensuring that they maintain the highest standards when involved in dealings with outside agencies whether or not they are acting on behalf of Air Business Ltd in this capacity. As such, staff and/or their family members should never solicit or accept personal advantages or gifts of material value from firms or persons and which gifts arise directly or indirectly as a result of the staff members association with Air Business Ltd.
- (ii). Business gifts may be accepted by staff members as courtesies where such are designed to build understanding and goodwill among business partners. In this context, during the traditional gift giving seasons, gifts of modest value may also be accepted, where refusal to accept might give offence.
- (iii). When an employee is a guest in another country and if the gift is being offered as part of a public occasion it is best to accept the gift on behalf of the organisation. In such situations, the employee should report the gift to his/her manager and hand it over to the organisation if requested to do so.

From A  
to Beyond

- (iv). Employees can accept promotional items of limited value, such as inexpensive pens, calendars, mugs etc. that bear a company's name. Employees of Air Business Ltd can also present gifts such as these to other business partners.
- (v). The value of gifts accepted in any year from any one source must not exceed £200. All staff are expected to disclose fully all individual gifts with a value exceeding £100 to their appropriate department head within Air Business Ltd.
- (vi). A gift which exceeds these criteria should be returned with a polite explanation stating that acceptance of the gift is not permitted under the Air Business Ltd Code of Business Conduct. Details of returned gifts must be notified to your manager.

### 3. GIVING GIFTS

- (i). Employees should not give any money or any gift to any director, executive, official or employee of any supplier, customer or any other organisation if doing so would influence or could reasonably give the appearance of improperly influencing the organisation's relationship with Air Business Ltd. Employees may provide a gift of a nominal value once it falls within the parameters set out in this Code in relation to receiving gifts and the same financial and practical guidelines apply.

### 4. RECEIVING BUSINESS ENTERTAINMENT

- (i). Entertainment of staff by suppliers or customers is acceptable within normal commercial criteria where such are designed to build understanding and goodwill among business partners. However, business entertainment must be moderately scaled and clearly intended to facilitate business goals. This criteria is defined as follows:
  - Business entertainment in the form of meals and beverages at a local venue is acceptable as long as it is modest and infrequent;
  - A ticket for a sports event (such as football, golf, racing, etc.) or other public entertainment at a local venue may be accepted;
  - Attendance at such events should be regarded with discretion and not become habitual;
  - The number of people representing Air Business Ltd at such events should be kept to a minimum and such representatives should always behave in an appropriate manner;
  - Identification in a public way by Air Business Ltd staff with a particular supplier/vendor should be avoided;
  - Endorsement of a particular supplier's design/product, to the exclusion of others, should be avoided, except where this accords fully with Air Business Ltd policy;
  - Under no circumstances may cash or cash vouchers be accepted by any staff member;
  - Entertainment should, as far as possible, be on an equivalent and reciprocal basis;
  - Overnight accommodation and foreign trips are not permitted.



An offer of entertainment which exceeds the criteria should be declined with a polite explanation stating that acceptance of the offer is not permitted under the Air Business Ltd Code of Business Conduct.

## 5. AIR BUSINESS LIMITED BUSINESS ENTERTAINMENT

- (i). Entertainment by staff of customers, suppliers and other parties is acceptable within normal commercial criteria where such are designed to build understanding and goodwill among business partners. However, Air Business Ltd business entertainment must be moderately scaled and clearly intended to facilitate business goals. The criteria outlined above in relation to receiving business entertainment apply equally to business entertainment provided by Air Business Ltd.

## 6. GENERAL GUIDELINES

- (i). Staff may generally accept gifts proffered in a business context or by virtue of the public profile of the staff member connected with Air Business Ltd provided:
  - the gift is unsolicited
  - the gift is of moderate value
  - details of gifts are notified at once to the person's manager within Air Business Ltd.

Under no circumstances may gifts of cash or cash vouchers be accepted by any member of staff in connection with their association with Air Business Ltd.

- (ii). It is the responsibility of each staff member to ensure that Air Business Ltd's image is not damaged in any way by the acceptance of gifts or entertainment which could compromise, or be perceived to compromise, his/her position or Air Business Ltd itself.
- (iii). In all instances, staff members should remember that Air Business Ltd is owned by a high profile public service organisation and must ensure that their dealings with suppliers and customers reflect the organisation positively.
- (iv). Staff who have concerns relating to the acceptance or giving of gifts and other entertainment items in connection with their business dealings should refer the matter to their manager.

## 7. SPONSORSHIP

Sponsorship must never be solicited from suppliers/vendors and where offered may only be accepted when expressly approved in writing by management.



## 8. DEROGATIONS

Derogations from this policy are not permitted other than in the most exceptional circumstances and then only with the express written approval of the Managing Director of Air Business Ltd.

## 9. APPLICATIONS

This policy applies to all employees and directors of Air Business Ltd and its subsidiary companies.

