

STATEMENT OF INTENT

Saffron Housing Trust and its Subsidiaries expects all of its Board members, employees, involved customers and those closely connected with our business to operate in a way that is open and transparent and not to abuse their position to gain any kind of incentive or advantage.

This Policy applies to all shareholders, employees, board and committee members, co-optees and involved residents of Saffron at all times. Such individuals are required to familiarise themselves with this Policy and the processes and procedures contained within it, and to make sure they follow it at all times throughout their relationship with Saffron.

This Policy should be read in conjunction with the NHF Code of Conduct 2022, Code of Conduct Policy, Anti-fraud bribery and corruption Policy and Financial Regulations.

1. PURPOSE

- 1.1 The purpose of this policy is to establish a framework on gifts & hospitality to ensure that Saffron Housing Trust (including its subsidiaries) operates within the law, regulatory requirements and according to best practice, in particular the Bribery Act 2010, section 122 of the Housing and Regeneration Act 2008 and the National Housing Federation's (NHF) Code of Conduct 2022.

2. RECEIVING OF GIFTS

- 2.1 Board Members, Officers and Employees and Involved Residents may, from time to time, receive gifts from external organisations.
- 2.2 Officers and Employees and Involved Residents should generally not accept gifts from persons or organisations.
- 2.3 Gifts may be accepted if they meet the following conditions:
- Items of a nominal value such as free pens, calendars and similar items.
 - Modest gifts up to a value of £20, provided that this does not exceed an annual limit of £100 from any one organisation or person, prior to consent from your line manager.
 - Gifts where refusal would cause needless offence and the giver is not seeking a decision or business from Saffron but merely wishes to express thanks for advice, help or co-operation received.
- 2.4 Gifts that cannot be accepted include but not limited to:
- Gifts of money or similar types of items (e.g. gift vouchers). If money is received, it must be returned to the individual or company.
 - Gifts from a firm which is currently bidding or tendering for work, or where acceptance might be seen to create an obligation
 - Gifts over £20, these must be declared and passed to the Governance Team for the use as raffle prizes or donations.

GIFTS & HOSPITALITY POLICY

3. GIVING OF GIFTS

- 3.1 Saffron may make discretionary contributions for the purpose of gifts for Employees and Involved Residents subject to an annual limit of £100 per individual, per 12-month period. This includes items such as recognition awards up to a value of £50 per person.
- 3.2 Saffron may make a discretionary allowance of up to £50 per occasion for the purchase of gifts for Employees or Involved Residents, subject to the approval of the Executive Team (in the case of Employees and/or Involved Residents) or the Chair of the Group Board (in the case of members of the Executive Team), in the following circumstances:
- (i) leaving Saffron after 2 year's continuous service;
 - (ii) maternity or paternity leave after 2 year's continuous service;
 - (iii) retirement;
 - (iv) bereavement; or
 - (v) any other circumstances approved by the person or persons detailed in paragraph 3.1 above (as applicable).
- 3.3 Any allowances for the purchase of gifts paid under paragraph 3.2 above are subject to an annual limit of £100.
- 3.4 Any allowance paid for the purchase of gifts which exceeds the above limits must be approved by a member of the Executive Team and Company Secretary. The Board will be required to approve significant hospitality, or gifts provided by Saffron or by its Board Members, or employees, (over the nominal amount) in order to avoid any suggestion of impropriety or reputational risk.
- 3.5 No allowance may be made for the purchase of gifts, nor may any other gift be made to any person or organisation which falls within one of the following categories:
- (i) Shareholders, former Shareholders or their Close Relatives ; or
 - (ii) a company which has a person falling within paragraph 3.4.(i) above as a director.
- 3.6 In order to prevent actual or potential conflicts of dualities or interest, Saffron employees must not buy gifts for customers (even if using personal funds) unless approved by their line manager in advance. This is to avoid compromising the employee's independence and professionalism, and inadvertently creating a claim of preferential treatment or obligation.
- 3.7 The Probity Policy provides information on situations where flowers may be formally presented to Board Members, as a traditional gesture.

4. HOSPITALITY

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- 4.1 Board Members, Officers, Employees and Involved Residents should never accept lavish hospitality, or any hospitality which could be interpreted as a way of exerting an improper influence over the individual's duties. This would include hospitality with an estimated value of more than £150.
- 4.2 Hospitality may be accepted if it has been declared and meet the following conditions:
- Hospitality where there is a genuine need to pass on information or represent Saffron in the community.
 - Hospitality which is part of legitimately building or developing relationships with a supplier or external organisation.
 - Situations where to decline hospitality could harm Saffron's relationships or reputation.
 - Hospitality that concerns attendance at a relevant conference or course where it is clear that the hospitality is corporate rather than personal.
- 4.3 Any attendance at sporting events, shows, concerts or similar events paid for by third parties and also attendance at award events, relevant to Saffron's' business must be agreed in advance by the relevant director and Company Secretary.
- 4.4 Board Members, Officers, Employees and Involved Residents should never do the following:
- Accept lavish hospitality, or any hospitality that could be interpreted as a way of exerting an improper influence over the way you carry out your duties.
 - Request hospitality, nor offer such hospitality to others on behalf of Saffron.
 - Give or receive hospitality if you or another person are involved in on-going commercial negotiations where a decision could be influenced.
 - Request or accept hospitality with parties involved in a tender process, or parties aiming to become potential suppliers or investors (However, for the avoidance of doubt, if agreed by your director and Company Secretary, you can accept and provide modest working lunches where business is being conducted over lunchtime).
- 4.5 Other than in exceptional circumstances, Saffron and its Subsidiaries will not provide hospitality or gifts to external organisations, other than hospitality with a value of up to £50 per person per event, such as catering for a lunch meeting, or commemorative gifts for a function, with a value not exceeding £20 per gift.
- 4.6 Saffron and its Subsidiaries may provide funding for social events at which Employees and / or Board members and/or Involved Customers are invited to attend, such as Christmas parties. Any such funding may be provided up to a limit of £150 per person per year including VAT. This complies with HMRC Tax and NI exempt limits.

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5. GIFTS AND HOSPITALITY REGISTER

- 5.1 Saffron will maintain a register of gifts and hospitality which is kept by the Governance Team.
- 5.2 To ensure openness and transparency, **all** offers of gifts and hospitality whether accepted or not, must be recorded as soon as possible after the offer has been made.
- 5.3 Gifts or hospitality you receive should be declared and sent to the Governance Team by completing a Gifts and Hospitality declaration form which is available on the Intranet or from the Governance Team. If you are uncertain whether or not to accept a gift or hospitality, please contact the Governance Team for further guidance.

6. BREACH OF POLICY

- 6.1 If a colleague or involved resident knowingly breaches the conditions of this policy, this may be grounds for disciplinary action.
- 6.2 Similarly, if a board/committee member knowingly breaches the conditions of this policy, this may constitute grounds for removal from office.
- 6.3 You are encouraged to report any incident or behaviour that does not adhere to this policy.
- 6.4 You must also report if you are offered a bribe by a third party, are asked to make one, or suspect that this may happen in the future. Alternatively, you may raise a concern through the Speaking Up Policy.

7. COMPLIANCE WITH HOUSING AND REGENERATION ACT 2008

- 7.1 Section 122 of the Housing and Regeneration Act 2008 restricts the making of gifts and the payment of dividends and bonus by RPs to (a) a Member (Shareholder) or former Member (Shareholder) of the RP and (b) a Close Relative of a Member (Shareholder) or former Member (Shareholder) or a company which has a director a person within (a) or (b), unless it falls within one of the permitted classes of the Act. No payment shall be made or gift given under this Policy in breach of Section 122 of the Act.

Consulted with CV	Not Applicable
Board/Committee	Board/ PNR Committee
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