

Gifts and Hospitality

AmcoGiffen (Amalgamated Construction Ltd and Giffen Group Ltd) conducts its business activities with Integrity, Professionalism and Respect and these core values are central to maintaining the reputation of the Company and our continued business success.

AmcoGiffen expects all Employees to conduct themselves with integrity, impartiality and honesty at all times and to maintain high standards of propriety and professionalism. This includes avoiding laying themselves open to suspicion of dishonesty or putting themselves in a position of conflict between their official duty and private interest. Employees should be aware that gifts and hospitality, offered by contractors, suppliers, service providers and others, might place an Employee in a vulnerable position. Even when offered and accepted innocently, others may misconstrue the intention behind such gifts.

This policy sets out AmcoGiffen's approach to the giving and receiving of gifts and hospitality to and from third parties. Gifts and hospitality given or received by Employees in connection with business dealings with AmcoGiffen **must**:

- **Be reasonable and modest** – any gift or hospitality should not be excessive or lavish and should always be within the bounds of recognised business practice and in accordance with the Gift and Hospitality Policy.
- **Not be intended to influence improperly a business transaction** – a gift/hospitality should not place the recipient under any obligation and should not be capable of being misconstrued.
- **Be allowed by law and be in strict compliance with the policies of the recipient's employer (as well as AmcoGiffen's policies)** – government and public authorities and our other business partners and customers often have laws or Codes of Practice which prohibit the receipt of gifts / entertainment or place particular restrictions on these. The provision of lunch or refreshments ancillary to a meeting should not contravene such a prohibition, but the provision of entertainment or attending a social event may do.
- **Be recorded and approved in advance where required under our policies** – prior written approval, through completion of the Gift/Hospitality Approval Form, is required when any gift / entertainment exceeds the limits in this policy. Details, including the value, of all gifts / entertainment given or received together with any approvals must be recorded in the Gifts and Hospitality Register. The Gifts and Hospitality Register will be reviewed by the AmcoGiffen Ethics Team quarterly.

We must all exercise due diligence and appropriate scrutiny with any gifts and hospitality offered, given and received by Employees in connection with our business, whether to people in the public or private sector. It is important that any suggestion of impropriety is always avoided. The Company's Code of Conduct and Business Ethics is intended to protect all Persons from any allegation of giving or receiving improper gifts or hospitality.



John Booth
Managing Director