

# TRUSTEE – GIFTS AND HOSPITALITY POLICY

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FOR A SAFER  
WORLD OF SPORT

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## 1 WHY WE HAVE THIS POLICY

- 1.1 Trustees should always have in mind that any gift or hospitality might give the impression that they are being influenced to show favour or disfavour to any person or organisation whilst acting as a Trustee of Podium Analytics (Podium).
- 1.2 In order to reduce the risk that any innocent acceptance of modest hospitality or gifts may compromise them in this way, a Trustee should not accept any reward or benefit, other than those listed below, from any member of the public or organisation with whom he/she has been brought into contact by reason of their role as a Trustee. Compliance with this policy is also a necessary part of ensuring compliance with the Bribery Act 2010.

## 2 HOSPITALITY/GIFTS THAT MAY BE ACCEPTED

- 2.1 Hospitality and gifts which may be accepted are as follows (subject to 4.2 below):
- 2.2 The provision of lunch/dinner or similar when it is part of an official visit or bona fide hospitality arrangement; and
- 2.3 Isolated gifts with an assessed value of less than £250. If a more expensive gift cannot be declined without causing embarrassment then it may, exceptionally, be accepted and reported to the Chair, and if the Chair reasonably requests, the gift shall be given to Podium. If it is the Chair who has received such a gift, he/she shall report it to the Trustees and they shall decide whether the gift should be given to Podium.

## 3 OFFERS THAT MUST BE REJECTED

- 3.1 If a Trustee is offered, directly or indirectly, hospitality or gifts by a third party and they either:
- 3.2 do not fall within the exceptions above; or
- 3.3 the gift or hospitality is offered in circumstances that may be perceived to exert improper influence (for example if it is offered in connection with the charity tendering for business), irrespective of whether it falls within 3 above;
- 3.4 the Trustee should state clearly to the third party that the acceptance of such hospitality is forbidden and that further offers should not be made. All such offers should be reported to the Chair. If it is the Chair to whom such an offer is made, he/she should report the offer to the Trustees.

## 4 OTHER POTENTIAL INDUCEMENTS

- 4.1 If a Trustee is asked to do anything, or procure that Podium does anything in return for a donation or fundraising activity or the provision of pro bono support, or otherwise feels uncomfortable about the manner in which a donation, gift or hospitality is offered, they should inform the Chair of this before accepting any such offer. The Chair shall decide, in consultation with the Trustees if they deems it necessary, what steps should be taken. If it is the Chair to whom such an offer is made, they should report the offer to the Trustees who shall consider the matter.

## 5 RECORD KEEPING

- 5.1 Any gifts or hospitality offered to or received by a Trustee, or any other offer to a Trustee, in connection with their role as Trustee that may be, or may be perceived to be, an inducement, must be declared and will be recorded in the Podium Gifts and Hospitality Register, which is maintained by the Company Secretary.