



QMA02.18 COMPANY POLICY GIFTS AND HOSPITALITY

Scope

This company gifts and hospitality policy applies to all prospective or current employees of the company, as well as independent contractors and persons acting on behalf of the company.

Purpose

Rederi AB Älvtank is committed to a high standard of openness, honesty and accountability. Our employees and business partners are the most important source of insight for revealing possible misconduct that needs to be addressed. This policy sets out the procedure staff must follow when giving or receiving gifts and hospitality.. Any misconduct to the policy will be thoroughly investigated .

Responsibility

The Managing Director is responsible for this policy and that procedures is followed. For contact details to Managing Director, see [QMP09.01](#) Company Static Ship Interest Contact List.

Communication

Rederi AB Älvtank will ensure that:

- All employees take part of this policy during the induction process
- This policy is easily accessible by all members of the organisation
- Employees are informed when a particular activity or change to worksite environment or practice aligns with this policy
- Employees are empowered to actively contribute and provide feedback to this policy
- Employees are notified of all changes to this policy.

Monitoring and review

Rederi AB Älvtank review policies annually. This will be carried out by Managing Director

Effectiveness of the policy will be assessed through:

- Feedback from employees, the Health and Wellbeing Committee and management
- Review of the policy by management and committee to determine if all objectives have been met.

Policy Statement

You must declare all offers of gifts and hospitality, made to or by you, regardless of value, in your role as an Älvtank employee. All such offers must be declared whether accepted or declined. Offers of gifts and hospitality may include items ranging from diaries, wall charts, and boxes of chocolates, to free international travel and accommodation. Declarations must be reported to Älvtank HR. It is your responsibility to ensure that you are not placed in a position that risks, or appears to risk, compromising your role or Älvtank's public and statutory duties. You should not be seen to be securing valuable gifts and hospitality by virtue of your job. You should not accept or provide any gift or hospitality if acceptance/provision will give the impression that you have been influenced/are deemed to be influencing while acting in an "official capacity". This Policy also applies to spouses, partners or other associates if it can be argued or perceived that the gift or hospitality is in fact for the benefit of the official. In exercising judgement as to whether to accept a gift or hospitality the question should be asked what public perception would be if the information was published given your role and circumstances.

Receiving gifts

You may retain all gifts valued at 60 Euro or under, whether given in recognition of presentations or otherwise.

For gifts exceeding a value of 60 Euro the following options are suggested:

- share the gift with all staff;
- raffle the gift for charity;
- donate the gift to charity; or
- make a donation to charity and keep the gift.

Accepting offers of hospitality - genuine business reasons

Hospitality offered should only be accepted where there is a direct link to working arrangements and a genuine business reason can be demonstrated, for example:



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- attendance or speaking at a conference, which provides complimentary subsistence, travel and accommodation (this does not need to be declared on the register except where a gift was received, see receiving gifts, above);
 - attending at a free training course; or
 - attending a drinks reception to network.

It is recognised that, in the course of carrying out your duties, you will need on occasion to ensure good relationships with existing and future contractors and stakeholders and that this may involve for example, the receipt of modest working lunches and dinners. These are acceptable where there is a genuine business reason. Hospitality invitations to events which are purely social events should be considered very carefully before accepting; in such circumstances it may be much more difficult to substantiate a genuine business reason. You are expected to use annual leave for such events. You may not accept free holidays from a current or potential contractor. These invitations should be recorded in the register whether received or declined.

Gifts and hospitality offered by Älvtank

Älvtank staff must be mindful that the value of all gifts and hospitality offered by Älvtank are expected that such funding will be used for legitimate purposes and demonstrate value for money. It is acceptable for Älvtank to provide modest hospitality in the way of working lunches and/or dinners to existing and potential contractors and stakeholders subject to a genuine business.

Declaration

You should make your declaration as soon as possible after the offer or receipt of gifts or hospitality. All declarations are to go to HR.

You should consult HR for any guidance required on this Policy. In general terms, if you have any doubt about whether an item should or should not be declared, you are advised to declare it.

Employees who fail to declare the acceptance/provision/decline of hospitality and gifts in accordance with this Policy may be subject to disciplinary action under Älvtank's Disciplinary Policy