

## **Gifts and Hospitality Guidance for our Third Parties**

Nationwide has recently revised its Gifts & Hospitality Policy and as a key supplier to Nationwide we thought it prudent to make you aware of this Policy so that you can understand what employees may/may not offer/accept to/from third parties.

### **Our Standard:**

Nationwide Group is committed to operating with honesty and integrity in all of our business activities and to promoting an anti-bribery and corruption culture across the Group. However, the giving and receiving of gifts and hospitality is considered to be a commonplace part or courtesy of business relationship building.

Such activities between third parties and Nationwide employees should be fair and even handed and the actions of employees should never give the impression that they might have been influenced by a gift or other consideration to show favour or disfavour to any person. Nationwide employees should always feel confident that their actions could withstand the test of public scrutiny and would not cause any embarrassment to the Group, themselves or any third party.

### **Our Expectations:**

It is the responsibility of all Nationwide employees to decide if the gift or hospitality is proportionate, reasonable, bona fide and acceptable under the G&H policy before accepting or offering a gift or hospitality. To protect themselves and Nationwide, they must never accept or offer gifts or hospitality where doing so is likely to influence (or could appear to have influenced) a business decision such as:

- the terms of any contractual agreement
- commercial or operational decisions
- any legal disputes
- current or potential future negotiations

### **Our Policy:**

In order to meet both our legal obligations under the UK Bribery Act 2010 and our regulatory obligations to have adequate systems and control in place to counter the risk of bribery and corruption taking place, we hold a Governance Forum each month to review our gifts & hospitality records. From time to time we approach 3rd parties that are making offers of gifts and hospitality to the Society in order to establish if employees are adhering the ABC policy and declaring records accurately. In line with Nationwide's zero tolerance

approach to bribery and corruption, the following are not permitted under our policies:

- Any invitation to a hospitality function where the donor of the hospitality is not present at the function
- Any extension of business trips for leisure purposes paid for by the host
- Any offer of hospitality that is the use of a donor's property
- Any gift or hospitality that would be illegal in breach of local or international bribery laws
- Any gift of cash or vouchers
- Any gift or hospitality that appears lavish or excessive
- Any gift or hospitality that is intended to influence the recipient to act improperly

**Our Policy in more detail:**

- Our employees can accept and offer gifts with a retail value up to a maximum of £100
- Our employees can accept or offer business breakfasts, lunches or dinners up to a maximum value of £250 per person
- Our employees must not solicit contributions from any 3rd party for fund raising or other charity events
- Our employees can accept or offer hospitality such as sporting events, music events, theatre, art and gardening shows, etc only when:
  - they can clearly articulate the business benefit of attending or offering the hospitality
  - they have gained advance approval at the appropriate senior level, regardless of value

When offering gifts and hospitality to our employees we would ask you to be mindful of the policy and understand that there may be situations where the employee may have to politely refuse an offer of a gift or hospitality.

Employees may contact you from time to time to try and establish the value of the gift/hospitality and we would be grateful for your co-operation in this respect.