

1.0 Policy Statement

Saffron Housing Trust, including all its subsidiaries, expects its Board members, employees, engaged customers, and business affiliates to conduct themselves with transparency and integrity, avoiding any misuse of their roles for personal gain or advantage.

This policy applies to all shareholders, employees, Board and committee members, co-optees, and engaged residents associated with Saffron. Each individual is expected to understand the policy, including its processes and procedures, and to follow it consistently throughout their affiliation with Saffron.

The policy should be read alongside the NHF Code of Conduct 2022, the Code of Conduct Policy, the Anti-Fraud, Bribery, and Corruption Policy, and the Financial Regulations.

2.0 Policy Scope & Objectives

The purpose of this policy is to create a framework for gifts and hospitality that ensures Saffron Housing Trust and its subsidiaries operate in accordance with legal standards, regulatory obligations, and best practices. This includes compliance with the Bribery Act 2010, Section 122 of the Housing and Regeneration Act 2008, and the National Housing Federation's (NHF) Code of Conduct 2022.

3.0 Receiving of Gifts

3.1 Board Members, Officers and Employees and Involved Residents may, from time to time, receive gifts from external organisations.

Officers and Employees and Involved Residents should generally **not accept** gifts from persons or organisations.

3.2 Gifts **may be accepted** if they meet the following conditions:

- Items of nominal value, such as promotional pens, calendars, and similar small tokens.
- Modest gifts valued up to £20, with an annual cap of £100 from any single organisation or individual, which requires prior approval from your line manager.
- Gifts that, if declined, would cause unnecessary offense, provided the giver is not seeking a decision or business from Saffron but simply wishes to express gratitude for assistance or collaboration received.

3.3 Gifts that cannot be accepted include, but are not limited to:

- **Monetary gifts or similar items** (e.g., gift vouchers) are prohibited. If such a gift is received, it must be returned to the individual or organisation.
- **Gifts from firms currently bidding or tendering for work** are not acceptable, nor are gifts that could be perceived as creating an obligation.
- **Gifts valued over £20** must be declared and handed over to the Governance Team, who will use them for raffle prizes or donations.

4.0 Giving of Gifts

4.1 Saffron may provide discretionary contributions for gifts to Employees and Involved Residents, limited to an annual maximum of £100 per individual over a 12-month period. This can include recognition awards valued up to £50 per person.

4.2 Saffron may allocate a discretionary allowance of up to £50 per occasion for gifts for Employees or Involved Residents, contingent upon approval from the Executive Team (for Employees and/or Involved Residents) or the Chair of the Group Board (for members of the Executive Team). This provision applies in the following circumstances:

- Leaving Saffron after 2 year's continuous service.
- Maternity or paternity leave after 2 year's continuous service.
- Retirement.
- Any other circumstances approved by the individuals mentioned in paragraph 4.2 above (as applicable).

Any allowances for the purchase of gifts paid under the above are subject to an annual limit of £100.

4.3 Any allowance for the purchase of gifts that exceeds the specified limits must receive approval from a member of the Executive Team and the Company Secretary. Additionally, the Board must approve any significant hospitality or gifts provided by Saffron or its Board members or employees (beyond the nominal amount) to prevent any perception of impropriety or potential reputational risk.

4.4 **No allowances** may be made for the purchase of gifts, nor may any gifts be provided to any person or organisation that falls into one of the following categories:

- (i) Shareholders, former Shareholders or their Close Relatives; or
- (ii) A company which has a person falling within paragraph 4.4.(i) above as a director.

4.5 To prevent actual or potential conflicts of interest, Saffron employees **must not** purchase gifts for customers (even if using personal funds) unless they have received prior approval from their line manager. This policy is intended to safeguard the employee's independence and professionalism and to avoid any perceptions of preferential treatment or obligation.

4.6 The Probity Policy outlines the circumstances under which flowers may be formally given to Board Members as a traditional gesture.

5.0 Hospitality

5.1 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.

5.2 Hospitality may be accepted if it has been declared and meet the following conditions:

- 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.

5.3 Any attendance at sporting events, shows, concerts, or similar activities funded by third parties, as well as attendance at award ceremonies relevant to Saffron's business, must receive prior approval from the appropriate director and the Company Secretary. This is designed to ensure that such engagements align with the organisation's values and avoid any potential conflicts of interest.

5.4 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.
- Do not request or accept hospitality from parties involved in a tender process or those seeking to become potential suppliers or investors. However, to clarify, modest working lunches can be accepted and

provided when business discussions are taking place, provided prior agreement is obtained from your director and the Company Secretary.

- 5.5 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.
- 5.6 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.

6.0 Gifts and Hospitality Register

- 6.1 Saffron will maintain a register of gifts and hospitality which is kept by the Governance Team. 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.
- 6.2 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.

7.0 Breach of Policy

- 7.1 If a colleague or involved resident knowingly breaches the conditions of this policy, this may be grounds for disciplinary action.
- 7.2 Similarly, if a board/committee member knowingly breaches the conditions of this policy, this may constitute grounds for removal from office.
- 7.3 You must report any incident or behaviour that violates this policy without hesitation. It is essential to uphold the standards outlined in this policy and ensure accountability within our organisation.
- 7.4 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.

8.0 Regulatory, Legal and Standards considerations

8.1 Section 122 of the Housing and Regeneration Act 2008 restricts the making of gifts and the payment of dividends and bonus by RPs to

(i) a Member (Shareholder) or former Member (Shareholder) of the RP and

(ii) a Close Relative of a Member (Shareholder) or former Member (Shareholder) or a company which has a director a person within (i) or (ii), 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.

9.0 Related Policies and Standards

- Speaking up Policy
- Anti-Fraud, Bribery and Corruption Policy
- Probity Policy

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