

## GIFTS AND HOSPITALITY POLICY

Huber Parking UK Limited

### Statement of Intent

Huber Parking UK Limited (Huber) firmly believes in a zero-tolerance approach to bribery and corruption, as laid out in the company's Anti-Bribery and Corruption Policy. This policy is reviewed and published online annually. However, Huber also accept that there are grey areas in this regard since the boundary between working and personal relationships can become blurry, and gifts will naturally be exchanged at some point in business dealings. Hence, this policy has been implemented to clearly define and detail Huber exact regulations regarding gifts and hospitality in business.

### Gifts and Hospitality Guidelines

It is recognised that gifts and hospitality inevitably occur in business. The following guidelines should be adhered to when offered a gift or hospitality:

- The gift should be in good faith and genuine.
- Nothing should be expected in return for the gift by either the giver or the recipient.
- The gift should be offered openly and not in secret.
- A gift in the form of a ticket to a sporting event, theatre, or other such occasion must never be accepted if the giver is not attending the same event. If the giver is attending, prior permission by a Huber Parking director or the business manager must be sought before accepting the event.
- A monetary gift in the form of cash, gift card or voucher must never be accepted.
- A gift below the permitted value threshold (£30) can be accepted without prior permission but must be declared in the Gifts and Hospitality Register.
- Gifts above the permitted value threshold (£30) require prior permission by a Huber Parking director or the business manager must be sought and must still be declared in the Gifts and Hospitality Register.
- Notwithstanding the rules above, should a sub-contractor gift a HUBER site team member a bottle of alcohol or non-alcoholic equivalent, this must be sent on to the HUBER site offices in Langley to be entered into the Huber company Christmas raffle. This is to ensure both Huber site and admin employees have equal access to gifts from sub-contractors. The gift must still be declared in the Gifts and Hospitality Register.

Inevitably, decisions as to what is acceptable may not always be easy. If any employee is in doubt as to the proper course of action regarding a specific offer of a gift or hospitality, the matter should be referred immediately to our business manager or a Huber Parking director.

Langley, January 2024



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Managing Director



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