Gifts and Hospitality Policy – October 2026

1. Purpose and Scope

1.1 In-Form Solutions Ltd, a company registered in England and Wales under number 03961045, whose registered office is at 88 Hill Village Road, Four Oaks, Sutton Coldfield, West Midlands B75 5BE ("the Company"), depends on the trust of its clients, suppliers and staff. Everyone acting for the Company must behave, and be seen to behave, honestly and fairly at all times.

1.2 This Policy sets out the rules for giving and receiving gifts and hospitality. It protects the Company's reputation, protects staff from any suggestion of improper conduct, makes sure all clients and suppliers are treated equally, and supports the Company's compliance with the Bribery Act 2010.

1.3 It applies to directors, employees, associate consultants, contractors and anyone else acting on the Company's behalf ("associated persons"). It should be read with the Anti-Bribery and Corruption Policy.

2. General Principles

2.1 Gifts and hospitality must never be given or accepted:

- to influence a decision, or as a reward for one;
- if they could look as though they affect anyone's judgement or advice;
- in the form of cash, vouchers, gift cards or anything else easily turned into cash;
- to or from anyone involved in a procurement or tender in which the Company is taking part, from the start of the procurement until the contract is awarded; or
- if they have been asked for.

2.2 If in doubt, decline. Nothing should be given or accepted that would embarrass the Company if it became public.

3. Receiving Gifts

3.1 Low-value token items, such as promotional pens, calendars and stationery, may be accepted without approval and do not need to be recorded.

3.2 Any other gift should normally be politely declined. Where refusing would cause serious offence, it may be accepted with the approval of a Director, and will then be donated to a charity chosen by the Managing Director.

3.3 Every gift offered, other than a token item, must be recorded in the Hospitality and Gifts Register, whether it is accepted or declined.

4. Receiving Hospitality

4.1 The following do not need approval or recording:

- normal working lunches or refreshments during a business meeting or visit;
- hospitality at a Company-approved conference, seminar or event, where it is offered to everyone attending;
- free seminars, talks or workshops open to everyone; and
- benefits from travel loyalty schemes on travel paid for by the Company.

4.2 Other hospitality, such as meals, entertainment or events, worth up to £100 a head may be accepted without approval, but must be recorded in the Register. Hospitality worth between £100 and £250 a head must be approved by a Director before it is accepted.

4.3 Hospitality worth more than £250 a head, or that includes travel or an overnight stay, should normally be declined. It may be accepted only in exceptional cases, with a Director's approval given before it is accepted.

5. Giving Gifts and Hospitality

5.1 **NHS and public sector staff.** NHS bodies normally require their staff to refuse gifts from suppliers and to declare hospitality. The Company must not give gifts to NHS or other public sector staff, other than low-value branded items such as pens or notebooks. Hospitality must be modest and linked to work, such as a working lunch or refreshments at a meeting.

5.2 **Other clients and contacts.** Any gift, and any hospitality beyond working refreshments, must be modest, proportionate and approved in advance by a Director.

5.3 All gifts and hospitality given, other than token items and working refreshments, must be recorded in the Register.

6. Hospitality and Gifts Register

6.1 The Register is held by Dawn Bond, Business Manager ("the Registrar").

6.2 Entries must be made within five working days, using the Register Entry Form, and show:

- what was offered or given, and its estimated value;
- who offered or received it, and their organisation;
- whether it was accepted or declined, and why;
- who approved it, if approval was needed; and
- where it was donated, if it was passed to charity.

6.3 The Managing Director reviews the Register at least every six months, and as part of the annual management review. Entries are kept for six years, in line with the Data Retention Policy and Schedule.

7. Breaches and Concerns

7.1 A breach of this Policy may lead to disciplinary action, which may include dismissal for serious cases, or to the ending of the engagement for associates and contractors. A gift or hospitality given or received as a bribe is a criminal offence under the Bribery Act 2010 and will be dealt with under the Anti-Bribery and Corruption Policy.

7.2 Anyone with a concern should raise it with the Managing Director, with the Chairman if the concern involves the Managing Director, or under the Whistleblowing Policy.

8. Review

8.1 This Policy is owned by the Managing Director and will be reviewed every 12 months, or sooner if the law, a client requirement or the Company's work changes.

This Policy has been approved and authorised by:

Name:	David Poynton	**Position:**	Chairman
Date:	29th October 2026	**Signature:**	
Agreed by:	The Board	**Date agreed:**	29th October 2026
Issue:	Issue 4 (replaces Issue 3, 26 May 2023)	**Next review:**	October 2027