

# Gifts & Hospitality (1 of 2)

All Unilever's relationships must reflect its ongoing commitment to doing business with integrity.

Hospitality can play a positive role in building relationships with customers, suppliers and other third parties. Likewise, it is sometimes appropriate to offer reasonable gifts, e.g. in the context of promotional events or product launches. However, as accepting or receiving gifts and hospitality can be open to abuse or generate actual or perceived conflicts of interest, this should occur sparingly and always be legitimate and proportionate in the context of Unilever's business activities.

This Code Policy sets out responsibilities of employees in relation to gifts and hospitality. It makes clear what forms of gifts and hospitality are always prohibited. It also explains in what circumstances gifts or hospitality may legitimately be given or received.

## Musts

### Employees must:

- Apply this Code Policy in good faith to ensure gifts and hospitality are never considered to be excessive, confer improper advantage or create an actual or perceived conflict of interest (see Code Policies on Anti-Bribery and Avoiding Conflicts of Interest)
- Familiarise and observe the local monetary limits that Unilever has set separately for gifts and for hospitality, unless exempted in accordance with this Code Policy



# Gifts & Hospitality (2 of 2)

## Musts

### Gifts

Employees **must**:

- Ensure that any gifts offered (other than Unilever branded merchandise) or received do not exceed the local monetary limits for gifts, are one-off or irregular in nature and always comply with the Code Policy on Avoiding Conflicts of Interest. Although employees are not required to record such gifts centrally, they must keep their own records for inspection. All exceptions require prior clearance by their Business Integrity Officer
- Ensure that if they are offered a gift that exceeds the local monetary limits for gifts they must politely decline and explain the Unilever rules. In exceptional situations where such gifts have to be accepted to avoid causing serious offence, or circumstances genuinely preclude their return, employees must:
  - Obtain clearance from their Business Integrity Officer; and
  - Where appropriate take steps for the gift to be donated to charity

- Ensure that all gifts by employees that take the form of Unilever branded merchandising materials must be legitimate and proportionate

### Hospitality

Employees **must**:

- Ensure that hospitality is only offered or accepted if:
  - There is a legitimate business interest in doing so
  - Its value does not exceed the local monetary limits for hospitality; and
  - It remains one-off or irregular in nature
  - It is in the form of a locally hosted meal, attendance at, or participation in an organised 'team-building' occasion, local cultural or sporting event, local industry award ceremony, business site visit or similar responsible activity
  - Usual business contacts from Unilever and other parties are physically present

Employees are not required to record such hospitality centrally, but must keep their own records for inspection and ensure expenditure associated with any hospitality provided by, or on behalf of, Unilever is approved using Unilever's standard local expense processing and clearance systems.

In exceptional circumstances where employees seek to offer or accept hospitality above the local monetary limits for hospitality, they **must**:

- Check their Line Manager supports the proposal
- Obtain clearance from their Business Integrity Officer; and
- Once approval is received, ask the third party to confirm that the offer or acceptance of such hospitality also complies with its equivalent gifts and hospitality policy

In other circumstances where employees are offered or asked for hospitality that exceeds relevant local monetary limits for hospitality they must politely decline by reference to this Code Policy.

## Must nots

Employees **must not**:

- Discuss, offer or receive any gifts or hospitality activity involving public officials or their family members without prior clearance from their Business Integrity Officer
- Offer or accept any gifts or hospitality, or any other favours which are intended or might be seen to influence business decisions or create an obligation to do something in return
- Offer or accept any gifts that are in cash or a cash equivalent, such as lottery tickets, gift certificates, vouchers, loans, guarantees or any other granting of credit, shares or options
- Offer or accept any hospitality involving overnight stays or foreign travel without prior written clearance from their Business Integrity Officer
- Offer or accept any hospitality that is not consistent with the Code Policy on Respect, Dignity and Fair Treatment, or may cause offence under local norms and customs

All clearances from their Business Integrity Officer referred to in this Code Policy must be obtained following the gifts and hospitality disclosure process available [here](#)