

## Gifts & Hospitality Policy

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| <b>Document ID/Version:</b>                                                                                                                                                                                                 | V1                                                                                                                                                                                                             |                                                                                                                                       |                                                           |
| <b>Executive Lead (Owner):</b>                                                                                                                                                                                              | Group General Counsel                                                                                                                                                                                          |                                                                                                                                       |                                                           |
| <b>Policy Author:</b>                                                                                                                                                                                                       | Assistant Director Legal Governance & Procurement                                                                                                                                                              |                                                                                                                                       |                                                           |
| <b>Strategic alignment:</b>                                                                                                                                                                                                 | This policy reflects the requirements of the National Housing Federation Code of Conduct and promotes the principles of Integrity and Accountability which build the reputation and trust in the organisation. |                                                                                                                                       |                                                           |
| <b>Review frequency:</b>                                                                                                                                                                                                    | Every 3 years                                                                                                                                                                                                  | <input checked="" type="checkbox"/>                                                                                                   | Other (state period)                                      |
| <b>Previous review date:</b>                                                                                                                                                                                                | N/A                                                                                                                                                                                                            |                                                                                                                                       |                                                           |
| <b>Date policy approved:</b>                                                                                                                                                                                                | 3 November 2025                                                                                                                                                                                                |                                                                                                                                       |                                                           |
| <b>Policy approved by:</b>                                                                                                                                                                                                  | Group Common Board                                                                                                                                                                                             |                                                                                                                                       |                                                           |
| <b>Next policy review date:</b>                                                                                                                                                                                             | October 2028                                                                                                                                                                                                   |                                                                                                                                       |                                                           |
| <b>IMPACT ASSESSMENTS</b>                                                                                                                                                                                                   |                                                                                                                                                                                                                |                                                                                                                                       |                                                           |
| <b>Equality Impact Assessment</b>                                                                                                                                                                                           |                                                                                                                                                                                                                |                                                                                                                                       |                                                           |
| <b>Completed?</b><br><input checked="" type="checkbox"/>                                                                                                                                                                    | <b>No</b><br><input type="checkbox"/>                                                                                                                                                                          | <b>Yes</b><br><input checked="" type="checkbox"/>                                                                                     |                                                           |
|                                                                                                                                                                                                                             | <b>If not required, state reason:</b>                                                                                                                                                                          | The policy applies equally to all colleagues, regardless of protected characteristics, and does not result in differential treatment. |                                                           |
| <b>Resident Impact Assessment</b>                                                                                                                                                                                           |                                                                                                                                                                                                                |                                                                                                                                       |                                                           |
| 1) Is this one of the agreed policies requiring resident consultation? Please refer to:                                                                                                                                     | <b>Yes</b><br><input type="checkbox"/>                                                                                                                                                                         | <b>No</b><br><input checked="" type="checkbox"/>                                                                                      |                                                           |
| 2) If yes, please confirm resident consultation has taken place                                                                                                                                                             | <input type="checkbox"/>                                                                                                                                                                                       | <b>Briefly detail changes arising from resident feedback:</b>                                                                         |                                                           |
| <b>APPROVAL - To show transparency and accountability, specify whether policies have been approved by the Board/Executive/Committee. Clear approval lines strengthen governance, ensuring assurance and accountability.</b> |                                                                                                                                                                                                                |                                                                                                                                       |                                                           |
| <b>Approval journey:</b>                                                                                                                                                                                                    | <b>Executive Team</b>                                                                                                                                                                                          | <b>Committee</b>                                                                                                                      | <b>Board</b>                                              |
|                                                                                                                                                                                                                             | <input checked="" type="checkbox"/>                                                                                                                                                                            | <b>Yes</b><br><input type="checkbox"/>                                                                                                | <b>Committee name(s)</b><br>Add name, otherwise state N/A |
|                                                                                                                                                                                                                             |                                                                                                                                                                                                                |                                                                                                                                       | <input checked="" type="checkbox"/>                       |
| <b>Which Regulatory Standard does this Policy support?</b>                                                                                                                                                                  | <b>Economic</b>                                                                                                                                                                                                |                                                                                                                                       |                                                           |
|                                                                                                                                                                                                                             | <b>Governance &amp; Viability</b>                                                                                                                                                                              | <b>Rent</b>                                                                                                                           | <b>Value for Money</b>                                    |
|                                                                                                                                                                                                                             | <input checked="" type="checkbox"/>                                                                                                                                                                            | <input type="checkbox"/>                                                                                                              | <input type="checkbox"/>                                  |
|                                                                                                                                                                                                                             | <b>Consumer</b>                                                                                                                                                                                                |                                                                                                                                       |                                                           |
|                                                                                                                                                                                                                             | <b>Neighbourhood &amp; Community</b>                                                                                                                                                                           | <b>Safety &amp; Quality</b>                                                                                                           | <b>Tenancy</b>                                            |
|                                                                                                                                                                                                                             |                                                                                                                                                                                                                |                                                                                                                                       | <b>Transparency, Influence &amp; Accountability</b>       |

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|                                              |                                                                                                            |                                     |                          |                          |
|----------------------------------------------|------------------------------------------------------------------------------------------------------------|-------------------------------------|--------------------------|--------------------------|
|                                              | <input type="checkbox"/>                                                                                   | <input type="checkbox"/>            | <input type="checkbox"/> | <input type="checkbox"/> |
| <b>Associated legislation</b>                | Regulator of Social Housing: Governance and Financial Viability Standard 2015 and NHF Code of Conduct 2022 |                                     |                          |                          |
| <b>Associated procedures</b>                 | Gifts & Hospitality Procedure                                                                              |                                     |                          |                          |
| <b>Where is this policy to be published?</b> | <b>Website</b>                                                                                             | <b>Intranet</b>                     | <b>Both</b>              |                          |
|                                              | <input type="checkbox"/>                                                                                   | <input checked="" type="checkbox"/> | <input type="checkbox"/> |                          |

# Gifts & Hospitality Policy

## 1. Policy Statement

- This is a policy of Paradigm Housing Group Limited (t/a SettleParadigm). Any reference in this policy to “SettleParadigm” includes not only the Group Parent company, but also all its subsidiaries (Settle Group, Paradigm Homes Charitable Housing Association Limited, Paradigm Commercial Limited and Paradigm Commercial Services Limited).
- SettleParadigm is committed to conducting all activities fairly, honestly and openly, in accordance with relevant legislation and regulation, and to the highest standards of integrity.
- This Policy promotes a culture of honesty and accountability within SettleParadigm, ensuring that the receipt and offering of gifts and hospitality is done ethically, lawfully, and in a way that avoids conflicts of interest or undue influence. It also ensures that the receipt of gifts and/or hospitality does not place colleagues or board/committee members under an obligation that might influence or be perceived to influence their future decisions or conduct.

## 2. Objectives, desired outcomes and strategic alignment

This policy will support the culture and behaviours that will best enable SettleParadigm to deliver homes and services of an excellent standard to customers. It will ensure that:

- SettleParadigm has a record of any gifts and hospitality that have been offered, accepted and declined;
- Colleagues who are either offered gifts and/or hospitality or offer gifts and/or hospitality understand what is and is not acceptable to accept or offer.
- Colleagues do not place themselves in a position where they could be suspected of using their position to gain an unfair advantage for or from a third party;
- Colleagues do not place themselves under an obligation that might influence or be perceived to influence their future decisions or conduct.

## 3. Scope

- This Policy applies to Board/Committee members and colleagues and extends to any additional workforce such as agency staff, and any others who may be temporarily assigned to perform work or services for SettleParadigm.
- For the purposes of this policy, reference to “Gifts” does not include any grant funding that may be provided by or on behalf of SettleParadigm or individual members of the Group.

## 4. Policy Principles

- SettleParadigm generally opposes the acceptance/offering of gifts/hospitality from third parties (contractors, residents, whether they are existing, former or potential tenants, leaseholders or residents of a residential home, and other stakeholders), and in some circumstances we prohibit it, to avoid the risk of damaging our reputation or that of the wider housing sector.
- We recognise that there may be circumstances where the acceptance and/or offering of gifts and/or hospitality is in accordance with established business practice, but careful consideration will be required when deciding whether the offer should be made or accepted.
- If you receive gifts and/or hospitality, you should not place yourself under an obligation that might influence or be perceived to influence your future decisions or conduct.
- Acceptance should always be in the best interest of SettleParadigm and not for your personal gain or benefit.
- As a general principle, you should exercise caution and not accept gifts or hospitality from external organisations or individuals that may be in a position to benefit from actions or decisions taken by the Group. Anyone offering gifts should be asked to donate them for the benefit of customers or to the Group's charitable donations fund. Gifts from SettleParadigm to a third party or external individual or organisation can only be made in exceptional circumstances and with the approval of the relevant Executive Director or Chairman of the board or committee.
- The value and nature of any gift or hospitality must be reasonable, modest, and appropriate to the context in which it was offered. They must also fall within the parameters set out in this Policy.

### **What can be accepted?**

The following may generally be accepted, up to a value of **£15**, provided they are reasonable and proportionate:

- Modest promotional items such as branded stationery, calendars, or pens.
- Hospitality of a modest nature (e.g., tea, coffee, or light refreshments at meetings, or a business lunch).
- Invitations to sector-related events where attendance serves a legitimate business purpose.
- Hospitality should only be accepted if:
  - it is incidental to the conduct of business (such as a working lunch) or
  - the event is in direct furtherance of our business or linked to the sector.

### **What cannot be accepted?**

The following are strictly prohibited:

- Cash, or cash equivalent (e.g., vouchers or gift cards) or a payment) from any stakeholder.

- Gifts offered by residents with more than an estimated value of **£15** should be politely declined.
- Acceptance of gifts with an estimated value of **more than £25**. Such gifts must be donated to generate funds for to the benefit of customers or other charitable organisations supported by SettleParadigm.
- Gifts with an estimated value **over £15** but less than **£25** must be declared and a decision made by the relevant member of the Executive Team on whether it can be accepted by the employee or must be donated to one of the Groups charitable causes.
- Gifts or hospitality offered to colleagues during procurement or contract negotiations.
- Any gift or hospitality that could be perceived as a bribe or inducement is strictly prohibited. Concerns about improper conduct should be reported to a manager and addressed in accordance with the Anti-Bribery Policy and procedure.
- It is acknowledged that relationships with key stakeholders and external partners should be fostered. However, acceptance of hospitality from the same organisations or individuals on multiple occasions within a 12-month period, must be reasonable and proportionate. Each case must be declared and will be considered on a case-by-case basis.
- **Actions**
  - All gifts and hospitality that are offered or received must be done so openly and transparently, and this means that all offers, **whether accepted or not**, must be reported, approved (if they are to be accepted) and recorded in the Gifts & Hospitality Register.
  - The Gifts & Hospitality Register will be maintained by the Governance Team and will be reported to Executive Team/Audit & Risk Committee quarterly.
  - The acceptance of gifts and/or hospitality outside of the requirements set out in this policy will be a disciplinary matter.

## 5. Equality, Diversity & Inclusion

- The requirements of this policy apply to all Board and Committee members, employees and other workers equally, regardless of protected characteristics, and therefore will not result in differential treatment.

## 6. Roles and responsibilities

- Group General Counsel has overall accountability for the Policy.

- The Governance Team will maintain the Gifts & Hospitality Register; however, it is for individuals to provide details of all gifts and hospitality received or offered using the electronic form which is available on the intranet
- Decisions on whether gifts or hospitality which exceed the values stated within the policy can be authorised or not, must come from either a Head of Service or Executive Director depending on the proposed recipient.

## 7. Compliance/Key Performance Measures

- The Register will be reported to the Audit & Risk Committee on a quarterly basis. The report will be on the number of invitations or gifts and the number/percentage accepted or refused.
- The relevant manager

## 8. Related Policies, Procedures and Key Documents

- Gifts & Hospitality Procedure
- Probity Policy
- Anti-Bribery Policy
- Anti-Fraud Policy
- Code of Conduct

## 9. Version Control

| Version control |         |                    |                                          |
|-----------------|---------|--------------------|------------------------------------------|
| Date            | Version | Approved By        | Details of Amendments                    |
| 03/11/25        | V1      | Group Common Board | New integrated Policy for SettleParadigm |