Gifts, entertainment and hospitality

Northam recognises that gifts, entertainment and hospitality are part of business relations. However, our relationships with suppliers, customers and business partners, including government and other public bodies are conducted on the basis of objective factors, and are not influenced by the offer or acceptance of gifts, or the provision or receipt of entertainment or hospitality.

Our policies are not intended to restrict the establishment and building of legitimate professional business relationships, however caution must be taken when receiving gifts, entertainment or hospitality as this could raise suggestions of impropriety, or create a position of obligation on the part of the recipient. In addition, this could be seen as a way to unfairly gain business advantage, and constitute as a bribe.

Everyone associated with Northam must at all times avoid situations where the exchange of gifts, entertainment or hospitality could result in having an actual, perceived or potential influence on business decisions, relationships or expectations involving themselves, or close personal relations.

Always

- Adhere to the group gifts, entertainment and hospitality policy
- Consider the appropriateness of accepting a gift under business circumstances
- Disclose any gifts, entertainment or hospitality received irrespective of its value
- Report conduct that may be perceived as an attempt to bribe

Never

- Accept gifts, entertainment or hospitality that may create a sense of obligation
- Accept gifts, entertainment or hospitality which are lavish, inappropriate or in cash