

**Gift and Hospitality Policy
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Introduction

The purpose of giving or receiving gifts and hospitality is to foster good working relationships. This policy sets out the circumstances in which it is appropriate to accept gifts or hospitality and the record-keeping requirements. It is designed to protect the reputation of Hakika and employees from allegations of dishonesty, fraud or improper conduct.

Who does the policy apply to?

This policy applies to all full and part-time employees of Hakika, as well as temporary staff. It also applies to agents and other third parties acting on behalf of the organisation.

Definitions

A “gift” is any item of value provided or offered for the personal benefit of the recipient or a close contact (family, friend or colleague) at no cost, or a cost that is less than its commercial value. Gifts can also include offers of employment to family members

“Hospitality” is any offer of travel, accommodation, food, drink or an invitation to any event (e.g. concert, sporting event, either as a spectator or participant) in the company of a third party (including a client), which the recipient has received, or has themselves offered, as a result of their or their business’s employment by Kier. If a representative of the third party is not present at an event as the host, tickets for the event will be regarded as a gift and will be subject to the gifts value threshold and procedure stated below.

Layered levels of acceptability

Certain limits apply on the values of what Hakika considers acceptable gifts/hospitality. Consequently, the political association of the involved parties may also determine the acceptability of gifts. Most gifts have to be captured in the gifts and hospitality record while a few may be exempted. Below are the different layers of acceptability.

Any gifts delivered directly to Hakika should either be returned to the donor or if this is not feasible, should be passed to the Associate Director, Corporate Office for safe custody and disposal.

Staff must not ask for or accept gifts. Any offered gifts should be politely refused unless to do so would cause offence.

A common sense approach should be applied to the valuing of meals and refreshments (using an actual amount, if known, or a reasonable estimate).

here refreshments are provided by a third party, or at a business meeting/conference, subsistence allowances must not be claimed.

What is acceptable with out record?

- Low value branded promotional items such as pens or post-it notes may be accepted, retained by the staff member and do not need to be declared
- Offers of meals, refreshments and transport services under a value of \$25 can be accepted and need not be declared
- Travel and accommodation costs to attend events may be accepted but must be declared if they are with in the organisations limit. Anything outside that limit.

What may be acceptable with approval and recorded?

- Particular caution should be exercised when hospitality is offered by actual or potential suppliers or contractors. This can be accepted, and must be declared, if modest and reasonable.
- Approval from the relevant Director must be obtained prior to acceptance. A clear reason should be recorded on the gifts and hospitality register as to why it was permissible to accept.
- Offers of meals, refreshments and transport services under a value between \$25 and \$100 - can be accepted subject to paragraphs 10 and 11 above, and must be declared.

What is not acceptable?

- Gifts of cash should always be declined.
- Gifts from suppliers or contractors doing business (or likely to do business) with
- Hakika should be declined and the offer entered on the register of gifts and hospitality.
- Provision or acceptance of entertainment, such as tickets to sporting or cultural events should be declined.
- Gifts and hospitality over USD 100 should be refused unless the relevant Director has given prior approval or it would be inappropriate or impractical to decline the offer. A reason for accepting the offer must be given in the gift and hospitality record book.

Records

Records of gifts and hospitality need to be forwarded to the operations director after filing the form in Annex 1 and the director will put the document in gifts and Hospitality records folder in Google drive.

Reviews

This policy will be overseen by the Corporate Office and reviewed every three years. The next review will be October 2021.

Related policies

- Counter fraud and anti-bribery policy
- Staff / non-staff reimbursement policies

- HR policy
- Finance Policy

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Annex 1: Gifts and hospitality form

Please complete the form below for any Gifts and Hospitality requiring record keeping:

Name of employee	
Position	
Type of gift and hospitality received	
Estimate value	
Supplier	
Reason for supply	
Date	
Relevant action taken	

Send to the general director via email.