



## CORPORATE GIFT POLICY

### CORPORATE COMPLIANCE

WE ARE PROUD TO CONTRIBUTE ☺

25 OCTOBER 2018

## OBJECTIVES

- Define **guidelines in case gifts are received and given** by employees of centres operating under NH Hotel Group's brands, **when employees are acting on behalf of NH.**
- **Prevent and detect** situations that could result in **breaches** of the **regulation in force** or may have a **negative reputational impact** for NH.

## GENERAL GUIDELINES

- A **GIFT** is a **thing or service given willingly to someone for free or at a reduced cost** but the recipient does **not have a contractual right** to receive it.
- The following differentiation is made: **GOODS** (such as, objects, cash, or gift cards), **SERVICES** (such as, mentioned for guidance purposes but not limited to, tickets for entertainment events, football matches; trips, lodging, invitations to fairs) and **INVITATIONS TO MEALS.**



- **Delivery or acceptance** of gifts :
  - **Can not influence** or give the appearance of **influencing a decision making process**
  - **Can not be interpreted** as a **bribe or improper payment.**

## SCOPE

Current policy applies to all **Employees** working at centers operated under NH Hotel Group's

The following payments are **excluded from the scope** of this policy:

- **Tips**
- **Commissions paid by NH** to an Employee as a result of a commercial transaction.
- **Generic Marketing promotions**

## GUIDELINES

- Depending on the value of the **GIFT (goods/objects, services, invitations to meals)** it will be **necessary to request approval from MD (BUs)/Chief (HQ) or the Compliance Committee (details in the next page).**

Our **Code of Conduct** establishes general principles regarding gifts :

- **Not** acceptable for any value **above 200 EUR per gift or act of hospitality**. If not possible to return it must be notified to the **Compliance Committee**
- Not acceptable in any case if it might influence a business decision

This limit has been **set down to € 30** for **Employees** working at the Procurement and Projects & Buildings departments, since they are considered more sensitive groups.

The **Corporate Gift Policy** establishes :

## Unacceptable gifts – regardless of their value



1. **Cash or cash equivalent** (i.e gift card).
2. Any gift **when** there's a **tender or contract negotiation** with **NH in progress**.
3. **Items or entertainment** considered **illegal** or that **could affect** the **Company's reputation, interests** and **public image** in a **negative manner**.



## Groups to which gifts cannot be given in any case

Any gift **to or from public employees, officers, administrations** and **entities**.

- Generic Marketing promotions that do not set a specific beneficiary, are out of the scope of this policy (i.e. free late check-out promotions would be excluded from the scope of this policy; promotions of Group reservations that involve a gift to the person making the reservation, would be included).
- A **template** must be filled in by the NH recipient/giver and submitted to the SVP Compliance through the [giftcompliance@nh-hotels.com](mailto:giftcompliance@nh-hotels.com) and who will inform to the Compliance Committee.

		ACTIONS REQUESTER	MD/CHIEF	SVP COMPLIANCE	COMPLIANCE COMMITTEE
	Goods ≤ € 200	1. Recommendation: RETURN and report to <a href="mailto:giftcompliance@nh-hotels.com">giftcompliance@nh-hotels.com</a> 2. If it can not be returned, consider RAFFLING and report to <a href="mailto:giftcompliance@nh-hotels.com">giftcompliance@nh-hotels.com</a> 3. If ACCEPTED, report to <a href="mailto:giftcompliance@nh-hotels.com">giftcompliance@nh-hotels.com</a>	X	1. Inform to CC	Acknowledge
			X	2. Inform to CC	Acknowledge
			X	3. Inform to CC	Acknowledge
	Goods > € 200	1. RETURN and report to <a href="mailto:giftcompliance@nh-hotels.com">giftcompliance@nh-hotels.com</a> 2. Request APPROVAL TO MD/Chief and report to <a href="mailto:giftcompliance@nh-hotels.com">giftcompliance@nh-hotels.com</a>	X	1. Informa to CC	Acknowledge
		2. Template approval		2. Request approval to CC >1.000€ and inform to CC >200€<1.000€	Approval >1.000€
For gifts received during Christmas time, regardless of their value, they will be raffled among the employees at the work centre					
	Services ≤ € 200 (e.g. show tickets, football match, trips, free stays)	1. Recommendation: RETURN and report to <a href="mailto:giftcompliance@nh-hotels.com">giftcompliance@nh-hotels.com</a> 2. If it can not be returned, consider RAFFLING and report to <a href="mailto:giftcompliance@nh-hotels.com">giftcompliance@nh-hotels.com</a> 3. If ACCEPTED, report to <a href="mailto:giftcompliance@nh-hotels.com">giftcompliance@nh-hotels.com</a>	X	1. Inform to CC	Acknowledge
			X	2. Inform to CC	Acknowledge
			X	3. Inform to CC	Acknowledge
	Services > € 200	1. RETURN and report to <a href="mailto:giftcompliance@nh-hotels.com">giftcompliance@nh-hotels.com</a> 2. Request APPROVAL TO MD/Chief and report to <a href="mailto:giftcompliance@nh-hotels.com">giftcompliance@nh-hotels.com</a>		1. Inform to CC	Acknowledge
				2. Request approval to CC >1.000€ and inform to CC >200€<1.000€	Approval >1.000€

Gifts or acts of  
hospitality

Received



## Gifts given

1. They are not generally given, except for those managed by **Corporate Affairs and Commercial Departments**.

Invitations to  
meals to  
third parties

## Invitations to meals



1. The **travel policy** must be **followed at all times**:
  - Always try to organize the meal at an NH centre
  - **Limit of € 25 per pax**, or equivalent amount in the corresponding currency
  - Alcoholic drinks will be considered personal expenses and will not be refundable.
2. Any **exception** to this policy will be:
  - **Authorized by the Director** (hierarchical superior) of the corresponding department and reported to [giftcompliance@nh-hotels.com](mailto:giftcompliance@nh-hotels.com) **and also**
  - **Informed** to the **Compliance committee**, if the amount is > 100 €/pax

**All employees must complete the template and report to**  
**[giftcompliance@nh-hotels.com](mailto:giftcompliance@nh-hotels.com)**

# THANKS!

**nh** | HOTEL GROUP

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HOTELS

  
nh COLLECTION

*nh*ow

**Hesperia**  
RESORTS

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