

Global Gifts, Hospitality and Charitable Donations Policy

1. Purpose

To ensure that:

- JM and its employees comply with global anti-bribery and corruption laws such as the UK Bribery Act (UKBA) and the U.S. Foreign Corrupt Practices Act (FCPA).
- We mitigate conflicts of interest.
- We conduct our business in accordance with our high ethical standards and values.

2. Definitions

Word	Definition
Charitable donation	Voluntary philanthropic contributions and non-commercial sponsorships in the form of monetary / non-monetary gifts where no return payment / service is expected or made
Gifts	All products, services, cash or cash equivalents (such as cheques, traveller's cheques, gift cards, vouchers, loans and shares) and all business courtesies, gratuities, discounts, favours and other things of any value—even if nominal— for which the recipient does not pay the fair value.
GH&C register	The Register located at https://myjm.sharepoint.com/teams/GiftsandHospitality
Hospitality	All meals, drinks, entertainment (including, but not limited to, tickets or invitations to sporting or cultural events), recreation, travel, accommodation (such as hotel stays) and other courtesies which are of any value—even if nominal—and for which the recipient does not pay the fair value
Occurrence	All aspects of Hospitality or Gifts provided at an event. For example, a cocktail reception followed by a concert constitutes a single Occurrence
Public official	Includes (but is not limited to): <ul style="list-style-type: none"> • individuals (whether elected or appointed) who hold positions of any kind in any national, local or municipal government (eg, legislative, administrative, military or judicial); • individuals who exercise a public function for or on behalf of any branch or public agency of any national, local or municipal government; • officers, employees or representatives of any wholly or partially government/state-owned or controlled commercial enterprise ("SOE"), public international organisation, non-governmental organisation, regulatory agency, exchange or listing authority; and politicians, political candidates or employees of any political party
Senior Leader	The most senior member (by position/title) of a business unit or function – ie, a GLT member, someone reporting to a GLT member or someone a GLT member specifically designates as a Senior Leader for purposes of this policy

3. Policy

3.1 Gifts & Hospitality (G&H)

- We recognise giving and receiving Hospitality has legitimate business purposes. JM employees are permitted to give and receive Hospitality but the giving and receiving of Gifts other than corporate branded items is strongly discouraged.
- Because excessive G&H can be a form of bribery or corruption, this policy must be followed whenever giving or receiving G&H.

- Where a record in the G&H Register is required, this [link](#) must be used.
- You must report any suspected or actual acts of bribery to your legal advisor, GE&C or via the Speak Up process.

a. Financial thresholds for approval and recording of G&H:

- When giving or receiving G&H, the below approval and recording thresholds must be followed.

Gifts (Given or Received)

#	Description	Financial threshold	Pre-approval ¹ requirements for non-Public Officials	Pre-approval ¹ requirements for Public Officials	G&H Register record required
i	Corporate branded Gifts	Under £20	None	None	No G&H record
ii	All Gifts other than those included in (i)	Under £50	Line manager	Line manager	✓
iii	All Gifts	Between £50 and £150	Senior Leader	Senior Leader and Legal Advisor	✓
iv	All Gifts	Above £150	GLT member	GLT member and Sector/Function GC	✓

Hospitality (Given or Received)

#	Description	Financial threshold (per person, per occurrence)	Pre-approval requirements for non-Public Officials	Pre-approval requirements for Public Officials	G&H Register record required
v	All Hospitality	Under £50	None	None	No G&H record
vi	All Hospitality	Between £50 and £150	Line manager ²	Senior Leader and Legal Advisor	✓
vii	All Hospitality	Above £150	Senior Leader	GLT member and Sector/Function GC	✓

Important notes on the tables above (*please read*):

1. Pre-approval must be obtained where JM is **providing** a Gift (other than corporate branded Gifts under £20). However, pre-approval is not a requirement for Gifts **received** and, in this instance, approval after acceptance of a Gift is sufficient. If approval is not received, the Gift must be returned.
2. For Hospitality given to or received from non-Public Officials between £50 and £150 in value, line manager approval is not needed before the event, but approval must form part of the GH&C Register record.
3. Supplemental notes on the above table
 - Where Senior Leaders or GLT members require approval, this should be obtained from their line manager and, consistent with the tables, either a Legal Advisor or Sector / Function GC if the financial threshold ordinarily requires their approval.
 - Where the CEO requires approval, this should be obtained from the Chairman and the General Counsel & Company Secretary (where Legal approval is required).
 - When applying the monetary thresholds, the approval and reporting requirements in Annex 1 must also be followed (includes further information on accessing and using the G&H Register).
 - Currency equivalents for the values provided are in Annex 2 of this policy.

b. Rules For When G&H is Allowable:

- In addition to applying the above thresholds, the following conditions must be met:
 - The G&H is given / received in good faith and reasonable in value and frequency;
 - The G&H should be to / from people within organisations that have a business connection to JM (eg, customers, potential customers, suppliers), and there must be a legitimate business reason for it;

- The G&H was not requested by the recipient;
- The G&H shall not be provided to a party with whom JM is in a live tender;
- Regarding Hospitality, both the provider and recipient will be in attendance (with the exception of accommodation and travel if otherwise allowable);
- The G&H is not cash or a cash equivalent (such as cheques, traveller's cheques, gift cards, vouchers, loans or shares);
- The other party's organisation permits the giving or receiving of such G&H under the same circumstances;
- You are not giving or receiving the G&H in your personal capacity to circumvent this policy;
- G&H may only be provided to a legitimate business contact and not to their Close Relation—that is, the spouse, partner, family member, or similar close acquaintance.

3.2 Charitable Donations

- Charitable Donations are permitted at JM and are an important part of our social responsibility.
- When considering a charitable donation to a customer's, third party intermediary's, or other JM partner's charity of choice ("Partner's Charity of Choice"), you must consult with the Legal Team before donating as this type of donation carries an increased bribery and corruption risk.
- All charitable donations to a Partner's Charity of Choice must be recorded in the GH&C Register.
- Consult the Global Community Investment and Employee Volunteering Policy to ensure the donation is consistent with it.

Appendix

Approval and Recording Requirements

- Where GH&C must be recorded in the [GH&C Register](#), this must be done within 1 month of giving or receiving by the relevant individual. The individual giving / receiving the GH&C must ensure the record is accurate and complete.
- Where JM is providing Hospitality to others, the most senior JM attendee is required to record the event in the GH&C Register (even if they are not the organiser of the event). Other JM attendees do not need to separately record the Hospitality in the GH&C Register.
- Where individuals from JM are the recipients of Hospitality, each JM attendee must separately record their attendance at the event in the GH&C Register.
- Each Sector Finance Director and the Group Financial Controller (collectively, "Finance Director") is responsible for identifying a business unit Financial Controller or person serving in a comparable role for each Group Function (collectively, "Financial Controller") to review and monitor the GH&C Register for their business unit or functional equivalent ("Business Unit Register"). The Financial Controller may appoint a designee to perform this function so long as the Financial Controller provides appropriate oversight and recognises s/he ultimately is accountable for compliance with this requirement.
- When recording is required pursuant to Annexes 1 or 2, all individuals **must upload written evidence** of GH&C authorisations to the GH&C Register.
- If you reject any GH&C due to compliance concerns, this must be recorded in the GH&C Register.
- Financial Controllers must review their Business Unit Registers at least twice yearly to: (i) consider whether the BU Register is representative of transactions; (ii) identify overall trends and red flags; and (iii) sample entries to confirm accurate completion (collectively, "Key Requirements").
- Individual GH&C records held in the GH&C register including the associated records of approval must be kept for a period of at least 5 years.

G&H Currency Conversions

This table must be used in conjunction with the approval and recording thresholds found in the main body of this policy to assess the requirements for the countries listed – whether by employees located in these countries or by those travelling to these countries. The amounts provided in the table are not intended to be an exact conversion of the GBP values provided in the policy but a reasonable equivalent for that country.

Country	Currency	£20 equivalent	£50 equivalent	£150 equivalent
United Kingdom	GBP	20	50	150
Argentina	ARS	Apply exchange rate to UK GBP values		
Australia	AUD	40	100	300
Bahrain	BHD	10	25	75
Brazil	BRL	100	300	850
Canada	CAD	40	100	250
China	CNY	200	500	1,500
Eurozone	EUR	20	75	175
India	INR	2,000	5,000	14,000
Indonesia	IDR	350,000	875,000	2,500,000
Israel	ILS	100	200	650
Japan	JPY	3,000	7,000	21,500
Macedonia	MKD	1,500	3,500	11,000
Malaysia	MYR	100	250	800
Mexico	MXN	500	1,200	3,600
New Zealand	NZD	40	100	300
Norway	NOK	250	600	1,800
Poland	PLN	100	250	750
Russia	RUB	1500	4,000	12,000
South Africa	ZAR	400	1,000	3,000
South Korea	KRW	30,500	75,000	230,000
Sweden	SEK	250	600	1,800
Switzerland	CHF	25	60	200
Taiwan	TWD	750	2,000	6,000
Thailand	THB	800	2,000	6,000
United Arab Emirates	AED	100	250	750
United States	USD	25	75	200