

BetIndex Limited
Hospitality and Gifts Policy
Jersey

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Introduction

- 1.1 BetIndex Limited recognises that trust and confidence in the propriety of its activities is essential to its continuing success and growth. In order to foster the trust and confidence that clients, suppliers, workers and the community in general have in the Company, it is important that the Company, its employees and agents behave, and are seen to behave, appropriately and honestly at all times.
- 1.2 The policy on Hospitality and Gifts Policy aims to:
 - 1.2.1 Protect the reputation of BetIndex Limited;
 - 1.2.2 Protect employees from accusations of impropriety;
 - 1.2.3 Ensure that all clients and suppliers are dealt with on an equal basis;
 - 1.2.4 Avoid any potential conflicts between employees' private interests and professional duties;
 - 1.2.5 Instil a culture against corruption in the Company and put in place a gift and hospitality monitoring process in furtherance of compliance with global legislation such as the Corruption (Jersey) Law 2006 & the Bribery Act 2010 (UK) herein referred to as the Acts.
- 1.3 Employees are advised that, notwithstanding anything contained herein, where there is any doubt over the permissibility or propriety of accepting a gift or hospitality offer they should decline that offer. Nothing should be accepted which would bring the Company into disrepute.
- 1.4 This policy applies to BetIndex Limited and to any associated persons of BetIndex.

2. Receiving Gifts

- 2.1 It is not permitted to accept any gifts from customers, suppliers or other third parties involved with BetIndex Limited. An exception to this rule is the acceptance of gifts of low value regarded as tokens (promotional pens, calendars and stationery etc).
- 2.2 BetIndex Limited recognises that there may be exceptional instances when refusing a gift will cause significant offence or embarrassment. In such instances the gift may be accepted and you may be asked to donate it to a charity of your choice.
- 2.3 Where practicable any employee minded to accept a gift should first seek approval from his manager or any director. If it is not practicable to gain prior approval, the accepting employee should inform your manager or director as soon as possible after receiving the gift.
- 2.4 An accurate record must be kept of all gift offers made to employees or the Company by third parties, and must be filed in the "Hospitality and Gifts Register" ("the Register"). Any employee who is offered a gift other than a token should record, as soon as is reasonable practicable:
 - 2.4.1 A description of the gift offered;
 - 2.4.2 An estimation of the value of the gift offered;
 - 2.4.3 Whether it was rejected or accepted;
 - 2.4.4 If accepted, why it was accepted;
 - 2.4.5 Whether prior approval was obtained, and if so, from whom; and
 - 2.4.6 (where appropriate) to whom it was donated to (see sub-Paragraph 4.4 below).

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4. Hospitality

- 4.1 "Corporate Hospitality", for the purposes of this policy, is any form of accommodation, entertainment or other hospitality provided for an employee of BetIndex Limited by a third party and which is extended to the employee solely or significantly due to his position as a representative of BetIndex Limited. This excludes the classes of hospitality particularised at paragraph 3.2 below.
- 4.2 For the purposes of this policy and for the sake of clarity, the following are not normally considered Corporate Hospitality and will not require any approval prior to acceptance:
 - 4.2.1 Normal working lunches or refreshments provided during a business visit;
 - 4.2.2 Hospitality extended to employees attending an BetIndex Limited approved seminar, conference or other external event, provided that such hospitality is extended to all who are in attendance;
 - 4.2.3 Free seminars, talks or workshops, provided that they are free to all in attendance and are not provided solely for employees of BetIndex Limited.
- 4.3 All employees are required to obtain approval before accepting any form of Corporate Hospitality which is offered to them. Approval must be sought from your manager or a director.
- 4.4 An accurate record must be kept of all Corporate Hospitality offered to BetIndex Limited or to employees of BetIndex Limited for entry on the Register. Any employee offered any form of Corporate Hospitality must record, as soon as is reasonable practicable:
 - 4.4.1 A description of the hospitality offered;
 - 4.4.2 An estimation of the likely value of the hospitality;
 - 4.4.3 Whether it was rejected or accepted;
 - 4.4.4 If accepted, why it was accepted; and
 - 4.4.5 From whom prior approval was obtained.

5. Hospitality and Gifts Register

- 5.1 The Register shall be held by [REDACTED].
- 5.2 All offers of gifts and hospitality must be recorded in writing, including all of the information specified in this policy and must be signed and dated by the employee and the relevant manager before being given to the Registrar, who shall update the Register accordingly.
- 5.3 **The written record must be completed** as soon as is reasonably practicable, and be filed with the Registrar **within 5 working days** of the offer of the gift or hospitality.
- 5.4 It is anticipated that instances may arise where a gift accepted by BetIndex Limited or one of its employees has not been donated by the time that the relevant entry is made on the Register. In such cases the Register must be updated within 5 working days of the date on which the donation was made.

6. Breach of this Policy

- 6.1 Compliance with this policy is essential to the protection of BetIndex Limited's reputation and that of its employees. Any employee or associate person who is found to have acted in contravention of this policy or its principles may be subject to

disciplinary action, including summary dismissal where the breach amount to gross misconduct.

- 6.2 Any employee or any associated person giving or receiving bribes or bribing a foreign official will face disciplinary procedures as well as possible criminal charges where applicable under national or international legislation.