

# CHEZ BELMOND

WHERE INTEGRITY IS ALWAYS ON THE MENU

## GIFTS, ENTERTAINMENT, DONATIONS & SPONSORSHIPS POLICY

### Purpose

Business gifts, invitations, donations and sponsorships form an important part of relationship building with our business partners and the communities around us. However, improper or excessive gifts, invitations, donations and sponsorships can be a form of bribery or corruption and may also give rise to a conflict of interest. These activities require careful review and evaluation to protect our reputation, and ensure that we comply with applicable laws and regulations. The purpose of this policy is to describe our requirements for gifts, invitations, donations and sponsorships.

### Definitions used in this policy

Click on Bianca to explore some key definitions used in this policy:



### Situations where we always obtain pre-approval

#### You are proposing to offer or accept:

Food, beverage or entertainment exceeding Euro 200 per person\*.

Gifts exceeding Euro 100 in value\*.  
\*or local equivalent

Approver

GM (product based)  
Divisional Leader (if you are a GM)  
VP (corporate offices)

#### You are proposing to offer or accept:

A gift or invitation (of any type or value) to or from a Government or public official - whether directly or via an agent or intermediary (e.g. business consultant, lawyer or other professional advisor, customs agent, introducer, facilitator, or broker).

A familiarisation visit which does not comply with our pre-approved criteria (see familiarisation visits - pre-approved criteria below).

A charitable donation or sponsorship.

Something which you are concerned is too expensive, or is being made repeatedly to the same recipient, or is being made with the expectation that something will be given in return.

Approver


Compliance Team  
([compliance@belmond.com](mailto:compliance@belmond.com))

**Even if pre-approved, all gifts, invitations, donations or sponsorships must comply with applicable law.**





### How do we seek pre-approval?

-  We request pre-approval using the [Gifts, Entertainment, Donations and Sponsorship Pre-Approval Form](#).

### Where do we record the pre-approval we have obtained?

-  We submit all completed [Gifts, Entertainment, Donations and Sponsorship Pre-Approval Forms](#) to our local HR Director or Financial Controller, for inclusion in the relevant property/global/divisional office Compliance Hub.

### Things we never do

-  We never offer or accept anything which could cause embarrassment to, or reflect negatively on, the reputation of Belmond or the wider LVMH Group.
-  We never make political donations.
-  We never offer or receive gifts in cash, cash equivalents or in-kind payments.
-  We never offer to or receive anything from anyone that Belmond is in negotiations with, if this could be perceived as intended or likely to influence the outcome.



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## Familiarisation visits - pre-approved criteria

Familiarisation (FAM) visits do not require pre-approval where they meet **all** of the following criteria. The FAM visit:

- ✔ is ordinary course and business appropriate, with a clear business purpose;
- ✔ is recorded in the [Gifts, Entertainment, Donations and Sponsorship Pre-Approval Form](#) and submitted to your local HR Director or Financial Controller, for inclusion in the relevant Compliance Hub;
- ✔ includes business meetings with property management and property tours;
- ✔ only includes F&B and other entertainment within our pre-approved limits;
- ✘ does not involve comp or heavily discounted stays (>20%) for friends or family to accompany the representatives of our business partner **during** the business event;
- ✘ does not involve comp or heavily discounted stays (>20%) for the representatives of our business partner, their friends or family **pre-or-post** the business event.

When a discounted rate is offered to our business partners, or their friends and family, then this must be transparently offered as a benefit to **all employees** of the relevant business partner entity, rather than to a particular individual, and documented in your Pre-Approval Form.

## Additional responsibilities - pre-approvers

Pre-approvers are responsible for ensuring that:

- ✔ There is a clear and legitimate business purpose for offering or receiving the relevant gift or invitation.
- ✔ The relevant gift or invitation is not prohibited by our policy (see 'things we never do' above).
- ✔ The [Gifts, Entertainment, Donations and Sponsorship Pre-Approval Form](#) is signed.
- ✔ The [Gifts, Entertainment, Donations and Sponsorship Pre-Approval Form](#) is uploaded to the Compliance Hub.

## Further guidance

Should you have any questions or require further guidance regarding this policy, please contact the Compliance Team at [compliance@belmond.com](mailto:compliance@belmond.com).

## Application

Click on Marie to explore who this policy applies to and the consequences of any failure to comply with it.



## Governance

<b>Approval Date:</b> 27.04.2023	<b>Effective Date:</b> 27.04.2023	<b>Next Review Date:</b> 2024
<b>Version:</b> 1.0	<b>Division:</b> Global	<b>Authority:</b> Ethics & Compliance Committee
<b>Policy Owner:</b> General Counsel	<b>Contact:</b> <a href="mailto:compliance@belmond.com">compliance@belmond.com</a>	<b>Associated Policies &amp; Guidance:</b> Code of Conduct Anti-Corruption Policy Gifts, Entertainment, Donations and Sponsorship Pre-Approval Form LVMH Internal Guidelines on Gifts & Invitations Key definitions - public officials, gifts, hospitality Speak Up Policy Our Responsibilities

