

## **CHARITY POLICY**

### **Introduction**

Millennium & Copthorne recognises the extremely valuable contribution many charitable bodies make to society and humanity across the globe and sets out below its policy in respect of support given to charities, in donations of money and in kind. We choose our charity partners by reviewing the charity's history and assessing how the company and charity might maximise the benefits of collaboration. We do not base our choice on commercial considerations connected with a particular business deal or decisions made by a public body.

### **Who we support**

- We support appeals by registered or nationally recognised charities only.

### **What we support**

- We support specific projects which are identified from the beginning of our association with the charity.

### **How we support charities**

- We support our partner charities by fundraising, cash donations or gifts in kind. Activities and donations are approved in advance by the Regional Chief Operating Officer.
- We partner with charities for a two year term to allow relationships to mature and maximise the benefits of co-operation.
- We allow staff one day's paid leave per annum to work on a charitable project with the nominated local or national charity and encourage staff to work as a team on projects.
- We encourage individual charitable fundraising by staff, but fundraisers must respect the right of colleagues to decline to contribute.
- Where available, we operate payroll giving for staff to donate to charities of their choice.

### **What we do not support**

- We do not participate in appeals in support of an individual.
- We do not support individual "challenge" events.
- We will not fund a charity's administrative costs.
- We do not make donations in circumstances where donating to a particular charity or good cause could be interpreted as an inducement or bribe: a case study from Government guidance is attached at Appendix A.

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**Appendix A**

## Case Study 8 – Principles 1, 4 and 6: Community benefits and charitable donations.

A company ('L') exports a range of seed products to growers around the globe. Its representative travels to a foreign country ('M') to discuss with a local farming co-operative the possible supply of a new strain of wheat that is resistant to a disease which recently swept the region. In the meeting, the head of the co-operative tells L's representative about the problems which the relative unavailability of antiretroviral drugs cause locally in the face of a high HIV infection rate.

In a subsequent meeting with an official of M to discuss the approval of L's new wheat strain for import, the official suggests that L could pay for the necessary antiretroviral drugs and that this will be a very positive factor in the Government's consideration of the licence to import the new seed strain. In a further meeting, the same official states that L should donate money to a certain charity suggested by the official which, the official assures, will then take the necessary steps to purchase and distribute the drugs. L identifies this as raising potential bribery risks.

L could consider any or a combination of the following:

- Making reasonable efforts to conduct due diligence, including consultation with staff members and any business partners it has in country M in order to satisfy itself that the suggested arrangement is legitimate and in conformity with any relevant laws and codes applying to the foreign public official responsible for approving the product. It could do this by obtaining information on:
  - M's local law on community benefits as part of Government procurement and, if no particular local law, the official status and legitimacy of the suggested arrangement
  - the particular charity in question including its legal status, its reputation in M, and whether it has conducted similar projects, and
  - any connections the charity might have with the foreign official in question, if possible.
- Adopting an internal communication plan designed to ensure that any relationships with charitable organisations are conducted in a transparent and open manner and do not raise any expectation of the award of a contract or licence.
- Adopting company-wide policies and procedures about the selection of charitable projects or initiatives which are informed by appropriate risk assessments.
- Training and support for staff in implementing the relevant policies and procedures of communication which allow issues to be reported and compliance to be monitored.
- If charitable donations made in country M are routinely channelled through government officials or to others at the official's request, a red flag should be raised and L may seek to monitor the way its contributions are ultimately applied, or investigate alternative methods of donation such as official 'off-set' or 'community gain' arrangements with the government of M.
- Evaluation of its policies relating to charitable donations as part of its next periodic review of its anti-bribery procedures.