



Gifts and Hospitality Policy

Introduction: why we have this policy

This policy sets out where we stand on giving and receiving gifts and hospitality, in line with the Bribery Act 2010. It sits alongside our anti-bribery and corruption policy.

Strong relationships with our customers, suppliers and partners matter to Metaverse VR (MVR). Gifts and hospitality can be a normal part of building those relationships. They can also create a risk, or the appearance of one, where they could be seen as an attempt to influence a decision. This policy helps you tell the difference, so you can act with confidence and protect both yourself and our organisation.

This policy applies to you as an employee of MVR and to anyone working on our behalf.

What counts as a gift or hospitality

A gift is something given or received as a mark of friendship or appreciation, where nothing is expected in return.

Gifts include:

- Money
- Goods, for example flowers, vouchers, food, drink, or event tickets where you are not hosted at the event
- Services or loans

Hospitality is something you take part in with your host present, offered to start or develop a relationship.

Hospitality includes:

- Entertaining
- Meals
- Event tickets, where you attend in a hosted business context

If your host is not present, an offer of hospitality becomes a gift. You must treat it as a gift under this policy.

These 2 lists are not exhaustive. If you are not sure which category an offer falls into, please raise it with your line manager before you respond.

Receiving gifts: what you can accept

We recognise that giving and receiving gifts, where nothing is expected in return, helps build positive relationships with third parties. Where a gift is proportionate and properly recorded, it is not bribery and it is not a breach of this policy.

You may accept a gift of very low monetary value. You must not accept any other gift.

Please use your judgement on whether a gift is appropriate. Think about who is offering it and the context in which it is offered. Could it be seen as an incentive during a tendering exercise, for example? If you need clarification before you accept, you must speak with your line manager or HR.

Accepting hospitality: get approval first

You may accept offers of corporate hospitality. You must get approval from your line manager or HR before you accept.

Offering gifts and hospitality: what you must do

You must not give a gift, or offer hospitality, to any party in connection with our work without written approval from the Chief Operating Officer (COO). This applies to you and to anyone working on our behalf.

We will not approve a gift or hospitality offered in the name of MVR. All gifts and hospitality must be offered in the name of the employee making the offer.

Our gifts and hospitality register: keeping a clear record

Before you accept an offer, or make one, you must record the details on the Gift and Hospitality Register: [G&H Register](#)

You will need to provide:

- The name of the person or organisation offering or receiving
- Details of the gift or hospitality
- An estimated value
- The intention or context behind the offer, where you know it

Where prior approval is needed, we will record who approved it alongside these details.

Keeping the register up to date protects you and your colleagues and shows that we handle these offers openly. If you do not notify the COO or POL this may be treated as a disciplinary matter under our disciplinary policy.

If you are unsure: where to get support

If anything in this policy is unclear, please speak to your line manager. You can raise it in your next check-in, or sooner if you need an answer before you respond to an offer.

You can also contact the POL:
HR@Metaverse-vr.co.uk

Asking first is always the right call. We would far rather you check than turn down a genuine gesture or accept something that puts you in a difficult position.

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