



1. OUR CONDUCT



THE JAGUAR LAND ROVER WAY

CP1-009

GIFTS AND HOSPITALITY

APPLICABLE FUNCTION(S)
All

APPLICABLE JLR LOCATION(S)
Global

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JAGUAR LAND ROVER CORPORATE POLICY

DESCRIPTION

The Jaguar Land Rover group of companies (together JLR) is committed to undertake business fairly with honesty and transparency. This commitment must be reflected in every aspect of our business conduct, including the offering and acceptance of gifts and hospitality (G&H). This Policy provides guidance on what is and is not acceptable for G&H offered and received by JLR Personnel. It applies to all JLR officers, Directors and employees, together with others acting for or on behalf of JLR (collectively JLR Personnel).

Providing G&H is a way of building and maintaining good business relationships. However, offering or accepting excessive G&H may increase the risk of actual or perceived bribery and corruption. JLR has zero tolerance for acts of bribery and corruption.

This Policy aims to set the spirit of what is allowable. It is not possible to give an exhaustive list of every possible scenario. JLR expects a common-sense, practical approach to be adopted in interpreting this Policy. When following the guidance in this Policy, always consider: "Would I be comfortable offering or accepting the G&H if it came to the attention of JLR executives, Tata Motors management or the general public?"

STATEMENT

JLR Personnel may:

- Offer or accept gifts that are occasional, with a market value that does not exceed £100;
- Offer or accept hospitality that is occasional, business-related, modest in value and appropriate in all the circumstances.

All JLR Personnel must:

- Record all G&H given or received on the G&H Register. The only exception to the recording requirement is normal business meals (see 'Recording Gifts and Hospitality' below);
- Make sure that both JLR and the inviting/invited parties are present for the duration of hospitality events;
- Carefully consider whether the recipient is involved in any decision making that could be, or perceived to be, inappropriately influenced by the G&H being offered;
- Exercise extra caution when G&H are offered by a supplier during a tender process, or if JLR are offering G&H while tendering for business;
- Obtain approval before offering G&H to Public Officials. A Public Official is anyone elected or appointed to a position of official administrative, judicial or legislative public authority. The approval form is available on The JLR Way.

JLR Personnel must not:

- Offer or accept G&H if there is any suggestion or expectation that the recipient will do something in return;
- Offer or accept G&H if it could be perceived as creating a conflict of interests.

Acceptance of Travel or Accommodation

The costs of travel and accommodation for JLR Personnel should be incurred and reclaimed in line with JLR's expenses policy.

Situations where it is acceptable to have air travel or accommodation costs paid for by a third party are very rare, and require approval from your Functional Director. If JLR Personnel are offered air travel or overnight accommodation by a third party, and believe that there is a genuine business case for accepting it, they should contact the Group Compliance team for further guidance.

Other considerations

- An offer does not need to be described as either a gift or hospitality to fall within the scope of this Policy. For example, a 'prize' offered to a member of JLR Personnel at a conference should be treated in the same way as a gift.
- Hospitality invitations are sometimes extended beyond the main invited party to additional guests such as spouses or other companions. The letter and spirit of this Policy should be applied to any invitations involving additional guests. The invitations to the main invited party as well as additional guests must be considered together when deciding whether the offer is appropriate. If you are unsure whether an invitation would be appropriate, please consult with Group Compliance.

Recording Gifts & Hospitality

All G&H offered and received must be recorded on the G&H Register. Each Operational Head should establish a process for maintaining and periodically reviewing a G&H Register for their area of the business, and promote a culture of transparency.

The only exception to the requirement to record G&H is attendance at a normal business meal. Normal business practices in certain regions may include holding meetings over lunch or dinner. Where these meals are occasional and reasonable, it is not necessary for them to be recorded. Meals that are lavish, or more frequent than occasional, must be recorded on the G&H register. A template G&H register, which sets out the minimum level of information that should be recorded, is available on The JLR Way.

Out of Policy Gifts & Hospitality

If you are offered any G&H that is not in keeping with the letter or spirit of this Policy then you should politely reject it, explaining that accepting it would be against JLR's Corporate Policy.

In exceptional circumstances, if it is not possible to reject the offer, you should consult Group Compliance for further guidance as soon as possible.

Specific examples of prohibited G&H are given in Appendix 1.

Asking for Guidance and Reporting Concerns

To report a concern (in confidence) or to seek further guidance on the application of this policy, please refer to:

- JLR Group Compliance via group.compliance@jaguarlandrover.com ;or
- The JLR Code of Conduct

Dealing With Policy Breaches

Any breach of this Policy will be regarded as a serious matter and is likely to result in disciplinary action including potential dismissal.

DEPLOYMENT

Executive Management of JLR, including the Chief Executive Officer, Senior Functional Directors, Heads of Departments and other senior managers of JLR, are responsible for implementing this Policy in their areas of responsibility.

From time to time, compliance with this Policy may be the subject of monitoring and / or auditing procedures. Management should be prepared to explain and demonstrate how this Policy's requirements have been implemented in their areas of responsibility.

WAIVERS

There are no waivers for this document.

APPENDICES

Appendix 1: Examples of Prohibited Gifts & Hospitality

JLR Personnel must not accept or offer:

- Anything that could be perceived as intended to influence a specific business decision;
- Gifts with a market value of more than £100;
- Gifts of cash or cash equivalents (including loans, gift vouchers, mementos or souvenirs in the form of currency, etc.);
- Entry to adult entertainment clubs or other inappropriate events or locations;
- Tickets for an event where the inviting party does not attend.

JLR Personnel must not accept discounts made available to an individual that are not available to JLR Personnel generally.