



THE JAGUAR LAND ROVER WAY

CP1-009  
**GIFTS AND HOSPITALITY**

APPLICABLE FUNCTION(S) All	APPLICABLE JLR LOCATION(S) Global
LAST REVIEWED 20/03/2026	ISSUE LEVEL 3.4

**JAGUAR LAND ROVER CORPORATE POLICY**

Description

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.

To help you comply with this Policy you can consult our Ethical Decision-Making Toolkit found within the Code of Conduct.

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;
- During any tender process, extra caution is required around G&H. This applies both when a supplier offers G&H to JLR and when JLR offers G&H while competing for business. Gifts should not be given or accepted during a tender if you or the recipient are part of the decision-making process. You must exercise caution if hospitality is offered by a supplier during a tender process or if JLR is offering hospitality. You should consult Group Compliance if you intend to offer or accept hospitality in these circumstances.
- Obtain approval from [Group Compliance](#) 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.
- Donate any gifts valued over £100 to the JLR Foundation. The Foundation will use these items in support of its charitable objectives, which may include:
  1. distributing them to beneficiaries
  2. providing them to partner organisations
  3. using them for fundraising activities

The Foundation will decide how each item can be used most effectively, ensuring all decisions align with its mission and any obligations it may have.

Please get in touch with the Foundation via [engageforgood@jaguarlandrover.com](mailto:engageforgood@jaguarlandrover.com)

*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 [Group Compliance](#) and your Executive Committee Member. 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*

JLR maintains a Group-wide register of Gifts and Hospitality. All G&H offered and received must be recorded using the G&H Register tool, available on the JLR Intranet. Due to local data transfer laws, JLR's operations in China must use their local G&H Register tool.

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.

#### *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. If you cannot return gifts valued over £100, or to do so would cause offence, then the gifts should be donated to the [JLR Foundation](#) as described elsewhere in this Policy.

If you are unsure what steps to take, then 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*

If you need further guidance on whether G&H is acceptable, please contact Group Compliance at

[Group.Compliance@jaguarlandrover.com](mailto:Group.Compliance@jaguarlandrover.com)

To report actual or suspected incidents of non-compliance with this Policy you should use the reporting routes set out in the Code of Conduct and the Supplier 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, Executive Committee Members, 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.

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