

		GROUP	
Policy Name	Charitable & Community Donations' Policy	Date & Issue	10/11/2020 Issue 3
Approved	Executive Committee	Doc. Ref. No.	GRP-SE-059

Introduction

Countryside was founded in 1958 and is the leading UK mixed-tenure developer, specialising in placemaking and regeneration. Our business is centred around two complementary divisions, Partnerships and Housebuilding. Our Partnerships Division specialises in regeneration of private and public sector land, delivering open market, private rented and affordable homes by working with local authorities, housing associations, private rental sector landlords and on occasion private landowners. The Group also operates two factories producing products for exclusive use within the business. The Housebuilding Division, develops sites that provide open market and affordable housing, on land owned or controlled by the Group. The Group operates across London, the South East, the North West, the Midlands and South Yorkshire. In undertaking these activities, the Group recognises that it has an impact on the communities where it operates.

Purpose and scope

Countryside is proud of its charitable and community giving achievements, which bring potential benefits to thousands of people and the communities in which we operate. Our Charitable & Community Donations' Policy focuses on supporting and raising money for the Group's nominated charities and those that have some association to our developments and the communities around them. This is in addition to the Group's £1m Communities Fund which works with communities, partners and employees to identify charities and initiatives to help the most vulnerable in our communities at a local level.

This policy applies to all Countryside staff who wish to apply for funding for a charitable donation or sponsorship payment. Everyone at Countryside is responsible for making sure that they understand and adhere to this policy, which should be applied to any request for charity or community support involving monetary donations, the raising of funds, or gifts in kind.

Charitable donations or sponsorships should not be aimed at or result in any inappropriate or hidden commercial or direct return to Countryside. The motive and benefits for such activities should always be transparent.

This policy clarifies the types of activity that we will support and the procedures for approval of these activities.

This policy does not apply to personal donations or sponsorship by employees, i.e. those which do not use Countryside funds, for example sponsoring a colleague in a charity event. Individual volunteering carried out by Countryside employees is also not covered, unless it is done in work hours, on behalf of Countryside.

Match funding for individual employee fundraising activities may be provided at the discretion of the relevant charity budget holder (see below).

Match funding

Employees can once per annum apply for match funding (up to £1,500), from the Divisional budget against the monies they themselves have raised for the relevant charity.

The Budget is overseen by the relevant Divisional CEO whose approval must be obtained for all charitable and community donations.

Regional charities

A principal charity partner will be selected every two years and will benefit from all fundraising activity at a regional/office level. This will be selected via a poll of all relevant employees for the regional charities.

Group charity

The Group principal charity partner will be selected every two years by the Executive Committee with all Group fundraising to be donated to this cause along with an allocation from the Communities Fund. If employees have suggestions of local initiatives within our communities, an application can be made to the Countryside Communities Fund by emailing communities@cpplc.com.

Budget

There will be a Group budget of £100,000 per annum for match funding charitable activity and sponsorship, that includes donations to staff charities and other charitable events. The budget will be approved annually by the Executive Committee and controlled by the Head of Brand & Communications.

The budget will be allocated as follows:

- £5,000 will be held in each region
- £15,000 will be held at Group level

Eligibility

- The recipient of a donation must be a registered charity in the UK, a public sector organisation, a voluntary organisation or group that is part of an established establishment i.e. a Parent-Teacher Association (PTA)
and
- The recipient is a Group nominated charity or based locally to a Countryside development

The recipient requesting a donation from the Group must provide the following details:

1. Full name of group, charity, organisation and if a registered charity, its registration number
2. Complete address, telephone and email address of organisation/or managing organisation if a voluntary group
3. Name, title, phone number and email address of contact person
4. Purpose of donation or sponsorship and needs of local community addressed
5. How will Countryside's donation make a difference?
6. How you will report on the impact of the donation back to Countryside?

Approval and Time Reporting

It is important that we record who receives a charitable donation. The following process needs to be followed:

Step 1: Identify the charity/organisation to receive a charitable donation relevant to the Group, Division, Region or Staff Nominated Charity.

Step 2: Agree activity arrangements, the cause, dates, and any other details, with the regional Managing Director. If applying for funding from the Group budget, approval must be gained from the Group Head of Brand & Communications.

Step 3: Email your appointed Social Value Administrator to upload the donation amount on the Social Value Portal.

Organisation

The Group's Corporate Affairs team is responsible for this Charitable & Community Donations' Policy. It is led by a nominated member of the Group's Executive Committee.

Key considerations for staff

You must:

- Think about how your proposed donation or sponsorship relationship fits with Countryside's brand goals and make sure there is no actual or perceived inappropriate or hidden link between the proposal and any of Countryside's current or future business activities;
- Be transparent about the rationale and motive for your proposed donation or sponsorship, including declaring any expected benefits for Countryside; and
- Follow the procedure set out in the Anti-Bribery and Corruption Policy for registering and getting approval for charitable donations and sponsorships and complete the registration process honestly and accurately.

You must not:

- Offer or make a donation/sponsorship in a hidden or behind the scenes manner, without declaration or transparency. This is particularly important if the offer is linked to a bid, tender, contract renewal or prospective business relationship as this could be perceived as a bribe or dishonest inducement;
- If you think there may be any link between the proposed donation/sponsorship and existing or potential business for Countryside, you must register this with the Company Secretary for prior approval.
- Use an intermediary to offer or make any donation/sponsorship between Countryside and a charity (with the exception of official processors of donations, such as payroll giving donations and Gift Aid). If you are proposing funding via an intermediary, for example a donation to a UK charity for distribution to an NGO, you should seek approval from the Company Secretary;
- Offer or make any donation/sponsorship payment which could be linked to a political party, to the campaign of any candidate for elected office or in support of any elected official;
- Offer or make a donation/sponsorship payment to organisations not registered as a charity without getting approval first from the Company Secretary;
- Offer or make a donation/sponsorship payment to organisations that discriminate on the basis of race, ethnicity, nationality, religion, gender, sexual orientation, age or disability;
- Offer or make a donation/sponsorship to any organisation which is in legal or financial conflict with Countryside, or which does not share our approach towards ethical standards.