



Charitable and Political Donations Policy

Version 1.1

September 2021

Version Control

Version	Owner	Reviewer	Changes	Approval date	Next Review
1.0	Monica Whitefield	Lyca Amichia	Initial version or first version uploaded on portal - see ESG share for historical information	07/2021	03/2022
1.1	Monica Whitefield	Lyca Amichia	Added section on commitment to disclose donations.	09/2021	03/2022

Principles

Newable welcomes and encourages charitable fundraising efforts from staff, particularly where they assist the Company's commitment to:

- Helping and supporting the community;
- Contributing to the reduction of deprivation; and
- Supporting those in economic need.

Newable will include a specific charity budget in its business plan each year, and this policy is used, to ensure the budget can be distributed to best effect – and to those charities that fit with Newable's purpose and values.

Policy

Maximum contribution

Many of our staff are active and enthusiastic fundraisers, and the Company is happy to encourage and support their activity by matching funds raised by an employee in a voluntary capacity up to a maximum individual donation of £500 (and ultimately up to the total annual budget available for this purpose).

Individual employees making multiple applications for support of more than one charity will normally be restricted to a maximum matching donation from the company of £500 between those charities.

Usually no more than £500 will be donated in any one year to any single charity. However, several staff raising funds for a single charity, at one time or at different times in a year, will normally be able to apply for company support of a collective total of £1,000 in any one year.

By exception and entirely at the discretion of the Company the £500 limit may be exceeded (for example, in the case of environmental disaster).

Preferences

Applications are particularly welcome from staff actively involved in the work of a charity.

Restrictions

All charity projects and appeals must be approved by the Group Chief Financial Officer and Group Chief People Officer.

Campaigning charities, political charities and private school charities are excluded from this policy.

Newable reserves the right not to support a charity if it is considered to be in conflict with, or not to be in accord with, its strategic aims and values.

Payroll Giving

Payroll Giving is a scheme run through HMRC and administered by Charities Trust in conjunction with Newable. It allows employees to make simple, tax-effective donations to any UK charity or good cause.

Donations are deducted from gross pay – before tax is deducted. This gives immediate tax relief on donations and means it costs less for you as employees to donate.

Newable will pay any administration charges set by Charities Trust so the entire donations from staff go to their chosen charity.

Political Donations

Newable is a politically neutral organisation and does not engage in party political campaigning or make party political donations.

Newable does not give any money for political purposes in the United Kingdom, or outside of the United Kingdom, nor does it make any political donations to political parties or other political organisations, or to any independent election candidates, or incur any political expenditure.

The definitions of political donations and political expenditure used in the United Kingdom Companies Act 2006 are very wide ranging. They could cover activities that are an accepted part of engaging with stakeholders, ensuring that issues and concerns affecting our operations are considered and addressed. By way of example, this might include purchasing tickets for our occasional attendance at the Business days of party conferences. However, these are not political donations or political expenditure as they are commonly understood. These activities are not designed to support any political party nor to influence public support for any political party.

Disclosure Commitment

All charitable donations will be disclosed and reported in Newable's Annual Report and Financial Statements. In addition, if the Newable Board approves a political donation, as an exception to this policy, it will also be disclosed and explained in Newable's Annual Report and Financial Statements.