

Gifts Acceptance Policy



1. WHAT'S AT STAKE

In the course of your employment you may receive gifts from clients, vendors, business associates and others from outside ABC Company with whom you do business. While the offering and giving of gifts to company employees is a normal part of doing business and building business relationships, it may also be an illegal or unethical means of attempting to influence a company's decisions by buying the loyalty of its employees. Accordingly, accepting illegal or unethical gifts makes you and ABC Company a party to the violation or at the very least raises the perception of illegality or unethical behaviour that causes harm to your own and the Company's reputation.

2. PURPOSE

ABC Company has adopted this Policy to establish clear rules to help you understand which gifts cross the line so you can make informed and sound judgments about whether to accept them.

3. POLICY STATEMENT

As part of its commitment to conducting business in a legal, fair and ethical manner, ABC Company prohibits employees from soliciting or accepting gifts unless they follow the principles and procedures set out in this Policy. Violations of this Policy will be treated as a serious offence that may result in disciplinary action up to and including termination.

4. DEFINITIONS

For purposes of this Policy:

- **"Gift"** means anything of value that you offer or receive from a client, consultant, vendor or any other person or organization that ABC Company does or is considering doing business with;
- **"Offering" or "receiving"** a gift includes not only offers or deliveries directly

to you but also to your family member, relative, friend or other person or entity for whom receipt of the gift would benefit you.

5. GUIDELINES FOR ACCEPTING GIFTS

◦ GIFTS YOU MAY ACCEPT

In general, gifts are acceptable when they are within the bounds of propriety and good taste and not excessive or such as to compromise (or likely be perceived as compromising) an employee's objectivity, impartiality or integrity. Gifts you may accept include:

- Unsolicited gifts (other sports or entertainment tickets) with a value of \$100 or less, provided that the cumulative value of gifts to you from the same source does not exceed \$200 within a 12-month period;
- Conference, seminar, workshop and course giveaways of nominal value offered to promote registration, provided that the cumulative value of freebies for the same course does not exceed \$100; and
- Prizes won at an event in a draw or competition with a value that does not exceed \$100.

• GIFTS YOU MAY NOT ACCEPT

You may not accept, request, offer, give or approve:

- Any amount of cash or cash equivalents, including but not limited to gift certificates, gift cards, discount cards (whether redeemable for cash or merchandise), stock or other securities;
- Goods or services at reduced prices;
- Loans of money, material or equipment at preferential terms;
- Preferred treatment by or in a business enterprise;
- Gifts provided under an agreement that requires you or ABC Company to do or not do something in return for receiving them;
- Any gifts that would violate laws or ABC Company policies.

• EXCEPTIONS

While you may never accept gifts meeting the criteria of Section 5.2. above, you may accept gifts above the nominal values listed in Section 5.1. where declining the gift might reasonably be expected to offend the giver, provided that you immediately report the gift to the ABC Company HR Director who will determine whether:

- You can keep the gift;
- ABC Company should keep the gift; or
- You or ABC Company should sell the gift and donate the proceeds to an appropriate charity.

• TICKETS TO SPORTS OR ENTERTAINMENT EVENTS

You may not accept tickets to or invitations to attend a sports or entertainment event or venue unless you first get approval from the HR Department by demonstrating that:

- The purpose for attending the event is to build or deepen business contacts, discuss business issues or otherwise advance the business interests of ABC Company;
- Accepting the tickets would not compromise or likely be perceived as compromising your objectivity or impartiality; and
- Accepting the tickets would not otherwise compromise the rules and principles

set out in this Policy.

6. APPLICATION OF GUIDELINES

In applying the foregoing guidelines, err on the side of caution and do not accept the gift unless you feel comfortable that all of the following things are true:

- Accepting the gift is not for personal gratification but to gain a demonstrable business benefit for ABC Company;
- The gift would not reasonably be perceived as imposing an obligation on you or making you feel indebted to the giver;
- You would not be embarrassed if your co-workers knew you accepted the gift; and
- Neither nor ABC Company would feel embarrassed if it became public knowledge that you accepted the gift.

If you are not 100% certain about what to do, ask your supervisor or the HR Department before accepting the gift.

7. GIVING OF GIFTS

This Policy applies to accepting gifts from third party business associates. Rules governing the giving and offering of gifts are set out in the ABC Company Gift Giving Policy.

EMPLOYEE ACKNOWLEDGEMENT

I (print name) _____ acknowledge that I have read, understood and agreed to comply with this Gifts Acceptance Policy and that I have neither violated this Policy nor am aware of any person who has committed such a violation as of the date listed below.

Signature: _____ Date: _____