

Insert your

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**Ethics 1st Free Compliance Template:**

**Gifts & Entertainment Policy**

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# Purpose, Scope & Responsibilities

## Purpose

This document outlines [insert company]’s name Policy on gifts and entertainment.

The Policy applies to every employee, officer and director of [insert company], its subsidiaries and affiliates worldwide, as well as third parties acting on behalf of [insert company].

For [insert company] employees, officers and directors, violations of this Policy may lead to disciplinary action, up to and including termination of employment.

Any employee with knowledge or suspicion of violations of this Policy must report his/her concerns (as allowed by local law) to the [insert title of two officers in the company] and to the Legal Counsel, or to [insert company whistleblowing channels]

## [Insert Company’s Name] Commitment

This Policy reinforces our commitment to the highest standards of ethics and integrity in all employee’s conduct in all of our business activities by acting in a manner that enhances [insert company]’s reputation, as set forth in the Code of Ethics and Business Conduct and/or the Anti-Corruption Policy.

*Clearly state the goal of this policy from the standpoint of your organization. Highlight the benefits of this policy to the company and employees as well as the risk of non-obligation to the regulations therein.*

## Seeking Advice

You may find additional information in the [Code of Ethics / Employee Handbook] and with the [Human Resource Manager}.

If you are not able to find information on a particular question, do not assume that your action is permitted. Always consult with your manager or with HR team.

*Be sure to provide clear guidance on who employees are to seek advice concerning giving or receipt of gifts, hospitalities, or entertainment of any kind. It is helpful to include contact details by which the person(s) can be easily reached*

## Principles

Gifts and entertainment should never be offered or accepted with the intention to influence – or appear to influence – business decisions or relationships in any way.

Gifts and entertainment, offered or received, will only be acceptable if they are:

* Reasonable
* Appropriate
* Legal
* Not intended to influence
* Provided in accordance with this Policy and any associated documents (Code of Ethics)

## Definition Of Gifts And Entertainment

Gifts and entertainment include (but are not limited to):

* Corporate branded items
* Cultural courtesies
* Business gifts
* Travel or accommodation associated with a business conference, meeting, or event
* Business meals and refreshments
* Tickets to sports, music, or cultural events

Please refer to the [Human Resource Team or your immediate Manager] for further clarification on what applies as a “Gift”.

*Defining the terms “Gift”, “Hospitality” and “Entertainment” helps to remove any doubts or uncertainties and ensure that the board, management and all employees are of the same understanding.*

# Offering and Accepting Gifts & Entertainment

## General Standards

[Insert Company’s Name] must only be associated with gifts or entertainment involving third parties if:

* For legitimate business purposes
* Not solicited
* Not given to create, or give the appearance of, an implied obligation that the person offering is entitled to preferential treatment
* Not extravagant
* Reasonable and appropriate
* Not offered as a bribe, payoff, or kickback

[Insert Company’s Name] employees may pay for occasional meals and refreshments, as well as reasonable travel and accommodation when these are (i) modest in nature, (ii) at reasonable cost; according to local standards, and (iii) are provided in connection with legitimate education or business purposes.

If you are ever in doubt, please consult the [Human Resource Team or your immediate Manager] for clarity.

## Prohibitions And Restrictions

Unless otherwise expressly permitted, gifts and entertainment may only be offered to individuals with whom [Insert Company’s Name] has a business relationship, excluding spouses, family members, or friends of such individuals.

Tobacco products, cash or cash equivalents (such as gift cards or gift certificates) must never be offered or accepted. The giving of alcohol as a business gift is strictly prohibited.

[Insert Company’s Name] employees must ask potential recipients whether any rules or restrictions apply to them and ensure that any more restrictive limits are followed.

[Insert Company’s Name] employees may receive gifts or entertainment from business partners, only if they are reasonable (never lavish) and not in any way intended to influence. If it may be considered generous by an onlooker, you should politely refuse or seek guidance.

Under certain circumstances, when rejecting an inappropriate gift or entertainment is not possible, the guidance of your [Direct Manager or the HR Team] should be sought.

All gifts or entertainment received need to be recorded in the [Insert Company’s Name] Gift Register.

# [Insert Company’s Name] Gift Register

## Register

[Insert Company’s Name]’s gift register is updated monthly to keep track of the gifts and hospitalities given to employees to prohibit all types of corruption and bribery within the organization.

**ALL** employees are to register all material gifts, service gifts, donations or any other forms of hospitality received from direct business partners and/or third-party partners.

## Register Template

[Insert Company’s Name]’s gift register is similar to the template seen below and is custodied by the Human resource Department. Please follow the guide below when filling out the register. If you are unsure of what information to provide in the register, do not assume. Always consult with the HR Team to gain clarity.

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| Staff NAme & Date | Description of GIFT | Person/organization offering gift/hospitality | Estimated value of gift or hospitality ($) | Reason for acceptance |
| Celina Dior16/2/2001 | Silk Scarf | C-Kay Ventures (Billboard Vendor) | $200 | Declining might cause cultural offence  |
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