



# Gift Policy

Policy: #407  
Last Revised: September 2014

A JSJ Business

## SCOPE

This policy applies to all global GHSP employees, vendors, and customers.

## DEFINITIONS

None

## PRINCIPLE

While the gesture of gift giving may promote goodwill and enhance the working relationship between parties, abuse of gift giving may cause employee self interest to override the best interests of GHSP in making vendor sourcing or other decisions.

## POLICY

GHSP employees shall refrain from soliciting or accepting money, loans, credits, prejudicial discounts, gifts, entertainment, favors or special services from present or potential suppliers that might influence, or appear to influence business decisions.

Employees are prohibited from making or accepting any bribes, kickbacks or other unlawful or inappropriate payments in connection with GHSP business.

## PROCEDURE

### Gifts:

Unsolicited gifts of nominal value (\$50.00, 100 RMB, 500 Pesos or less) or trivial items of informational or advertising value are acceptable. If a gift in excess of \$50, 100 RMB or 500 Pesos in value is offered, or in situations where the same party or related parties offer repeated frequent gifts of less than \$50, 100 RMB or 500 Pesos in value, the employee must report the situation to the GHSP Executive Staff for guidance. Employees must obtain permission from the GHSP Executive Staff if they wish to give any gift or favor with a value of over \$50, 100 RMB or 500 Pesos.

When in other countries, local custom or practice dictates the exchange of gifts; the exchange of gifts of no material value with nongovernmental persons is permitted.

### Refusal

Any employee who is offered or receives an inappropriate payment or gift shall refuse it or return it to the giver in a tactful and dignified manner, advising the giver of this policy. Any offers that are clearly inappropriate will be reported to an Executive Staff member.

### Meals

Association with supplier representatives at luncheons, dinners, or business meetings are helpful in establishing better business understanding and is neither questionable nor unethical, provided the employee remains free of obligations. Meal invitations may not be extended to government employees.

### Outings

Acceptance of invitations to outings (baseball outings, air shows, golf outings) is acceptable with GHSP Executive Staff approval. Any gifts offered during these outings are subject to the same policy as other gifts. Any winnings obtained through skill events or drawings at these events are acceptable.

### Records

A copy of this procedure shall be distributed to all GHSP suppliers annually.

## EXAMPLES

None