

Child of this Culture Foundation

Gifts and Entertainment Policy

February 2021

From time to time in the course of employment, volunteer or Board member tenure with the Child of this Culture Foundation (COTC), an individual may be offered a gift or invitation to a sporting event or other form of entertainment from individuals or companies that do business with, or are interested in doing business with COTC. Additionally, there may be times where it is in COTC's interest for an employee or Board member to offer a gift or invitation to an event to a third party. This policy is intended to guide COTC employees, volunteer staff and Board members, and the employee's, volunteer staff's or Board member's spouses and immediate family members ("COTC Staff" will be used throughout this document to refer to these individuals) on how to handle such situations.

This policy should not be considered in any way as an encouragement to make, solicit or receive any type of entertainment or gift. Indeed, COTC Staff may not, under any circumstances, actively solicit any type of entertainment or gift. Further, COTC will not, under any circumstances, permit or authorize participation in any business gifts or entertainment that might be considered lavish, inappropriate or illegal.

Receiving Business Courtesies

General Rules:

I. Current Business Partners: COTC Staff may accept gifts from individuals and companies that currently do business with, or make donations to COTC as follows:

(a) partner/sponsor/supplier products and partner/sponsor/supplier-branded products (e.g., logoed jackets) with a value of up to \$1,000 per COTC Staff Member, per year, per individual/company;

(b) other gifts with a value of not more than \$200 per COTC Staff Member, per year, per individual/company;

(c) invitations for the COTC Staff to attend sporting events with an individual/company representative (including travel to and from such events only to the extent approved in advance by the Ethics

Committee);

(d) on an infrequent basis, invitations for a spouse or family member to join the COTC Staff member at a sporting event with an individual/company Representative;

(e) invitations to attend fundraising events with an individual/company representative at no cost to the COTC Staff Member;

(f) invitations to attend other social, educational or entertainment events intended to the business relationship, provided that the cost of the event does not exceed \$200 per COTC Staff Member, per event and \$400 total per individual/company per year; and

(g) perishable or consumable gifts provided that the gift is reasonable and not unduly lavish.

II. Prospective Business Partners: COTC Staff may accept gifts from individuals and companies that are not current business partners of the COTC, but that may or may not be seeking to engage in a business relationship with the COTC as follows:

(a) gifts with a value of not more than \$100 per COTC Staff Member, per year, per individual/company;

(b) invitations for the COTC Staff Member to attend sporting and cultural events with an individual/company representative (but not travel to and from such events);

(c) invitations to attend fundraising events with an individual/company representative;

(d) invitations to attend other social, educational or entertainment events intended to promote the possible business relationship, provided that the cost of the event does not exceed \$100 per COTC Staff Member per event and \$200 total per COTC Staff Member per individual/company per year.

COTC Staff may accept gift certificates within the limits set forth in this policy, but may never accept cash or financial instruments (e.g., checks, stocks).

Disclosure and approval:

All gifts or invitations falling under section I(a), I(c) and II(b) above and all invitations that involve the third party paying for the COTC Staff Member's travel and/or overnight accommodations must be promptly reported to the Ethics Officer. Prior to accepting invitations to opportunities that include travel and overnight accommodations during business hours, written approval must be received from the COTC Team Member's supervisor and the Ethics Officer.

Any potential gifts or invitations extended that exceed the limits and/or parameters noted above must be disclosed to, and approved in advance by, the Ethics Officer before they may be accepted.

In addition, the Ethics Committee shall have the right, in consultation with the affected COTC Team Member, to require that any gift(s) be donated to COTC or another agreed upon charity if the Ethics Committee believes that such gift(s) is not proper and/or creates an appearance of impropriety.

Extending Business Courtesies

General rules:

There may be times when a COTC employee, volunteer staff member or Board member (for purposes of this section "COTC Host") wishes, as a business matter, to extend to a current or potential COTC business associate (i.e., an individual or company) a gift or an invitation to attend a social event (e.g., reception, meal, sporting event, or theatrical event) to further or develop a business relationship.

In such instances gifts may not exceed \$200 per person per year, without the prior written approval of the CEO and/or the Ethics Officer. Gifts exclude the cost of airfare, hotel meals and incidentals for guests of COTC that are within the GSA limits.

Invitations to events must be reasonable and appropriate. Topics of a business nature must be discussed at the event, and the COTC Host must be present. The cost associated with such an event should not exceed \$200 per person/company per year, except with regard to sporting events and fundraising functions, without the prior written approval of the CEO and/or the Ethics Officer. Moreover, such business entertainment with respect to any particular individual must be infrequent, which, as a general rule, means not more than four times per year. The CEO and/or the Ethics Officer must approve frequency beyond the foregoing in writing. All such business entertainment must comply with the code of conduct or code of

ethics of the recipient's organization.

COTC colleagues may give gift certificates within the limits set forth in this policy, but may never give cash or financial instruments (e.g., checks, stocks).

Fundraising Team Members:

The COTC recognizes that the foregoing limits may hamper the ability of Fundraising team members to perform their job functions. In light of this, the limits will not apply to the fundraising team members if the invitation/event/etc. is part of his/her normal and reasonable job duties and providing the event is not lavish or unreasonable. For fundraising team members, costs of gifts and events should not exceed \$600 per person per year.

Government Employees:

The giving of gifts to federal, state and local government employees is governed by a complex set of rules that are typically agency specific. Generally, the giving of gifts to government employees is very limited or prohibited. Before offering a gift to a government employee, you must receive the approval of the CEO and/or the Ethics Officer.

Disclosure and approval:

All gifts or invitations must be covered by the appropriate COTC budget and must be approved in advance by the applicable COTC supervisor.

Any potential gifts or invitations extended that exceed the limits and/or parameters noted above must be disclosed to, and approved in advance by, the CEO and/or the Ethics Officer before they may be offered.

Summary

Generally, giving or receiving gifts or invitations are limited by rules set by the COTC, and COTC Staff are encouraged to seek advice if uncertain from either his/her supervisor or the Ethics Officer.