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|  | **ADVANTAGE PROFESSIONAL SERVICES INC.**  **EXECUTIVE SEARCH & Business SOLUTIONS**  ***Specializing In The Energy Industry***  **recruitment  ABORIGINAL RELATIONS**  **GOVERNANCE  RISK & Regulatory** |

**Gifts and Entertainment Sample Policy**

Advantage Professional has developed an example gifts and entertainment policy to help employees make the right decisions when providing or accepting gifts, entertainment or travel while conducting business on behalf of their employer. This sample policy also addresses your commitment to undertake business fairly with honesty and transparency. It aims to set the spirit of what is allowable and cannot cover all possibilities but relies on a common-sense and practical approach to be adopted in the interpretation of this Policy.

As a guideline when following this Policy always consider: "Would I be comfortable accepting the courtesy if it came to the attention of my executives and shareholders or the general public."

**Directions:** This policy should be included in your hiring package and reviewed as part of each annual performance evaluation to ensure all employees and management understand the parameters. This policy should be signed by each employee. This policy should be reviewed annually by management to reflect changes in business practices.

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**National Rental Inc. March 31, 2016**

**Corporate Policy No: CP1-009 Issue 1**

**Gifts and Entertainment**

**General Business Courtesies:**

* Gifts are occasional and do not exceed the value of \_\_\_\_\_\_ dollars
* Costs associated with general business courtesies are limited to reasonable expenses (normal mean allowances-not excessive misuse)
* Business partners are present for the duration of the meal/event
* Extra caution must be exercised when entertainment is offered by a supplier during a tender process or where it is envisaged a conflict of interest may arise. In these circumstances the entertainment should be politely refused
* Employees offering or accepting the gift/entertainment would be comfortable to discuss the matter with executives or shareholders
* Gifts/entertainment offered or accepted is without any expectation of reciprocity
* All gifts and entertainment given and received must be recorded in the corporate documents, expense reports, including the firms, suppliers, public officials name and titles.
* Gifts or entertainment must not be offered to or accepted from Public Officials, without the prior authorization of senior management. Senior management must have the approval of the Board of Directors before accepting or giving any gifts to a public official.

**Meals & Entertainment/Travel:**

* The entertainment must be business related and suitable to the role in the organization
* The business partner must be present throughout the duration
* Our corporate independence must not be compromised
* You must record all entertainment (both given and received) for review by our auditors if required
* Any social gathering or interaction must be conducted in locations/establishments generally recognized as appropriate for the conduct of business
* Should business principles must not be compromised
* If travel is offered, ensure you understand the costs associated before accepting.

**Rejection of Gifts/Entertainment**

* If possible, reject the gift stating it is against corporate policy to accept
* If this is not possible, due to cultural sensitivity, inform your management or HR and make an official record of the gift
* Thereafter it will be considered a corporate gift. Do not donate the gift or give it away as this action may cause reputational damage.

Employee Signature: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

Date Signed: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

