Gifts and Gratuities Policy

Document Governance

Function Owner	Department	Content Review Cycle	Date Last Revised
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1. Policy Statement

CRDF Global is committed to the highest ethical standards. We avoid impropriety, both in reality and in appearance, in relationships with suppliers, partners, funders, and other parties with whom CRDF Global conducts business or may conduct business in the future, whether directly or indirectly. Gifts, gratuities, entertainment, or special consideration from current or prospective customers, vendors, or partners can have the appearance or effect of influencing the judgment of the recipient in the performance of their duties and as such we have established the following policies related to gifts and gratuities.

All staff and contractors, agents, or other individuals acting on the behalf of CRDF Global or in the performance of work conducted for CRDF Global ("Covered Parties") are required to comply with the provisions of this policy relating to the giving and receiving of gifts and gratuities.

General Guidelines

- Covered Parties shall not solicit gifts of any amount from any supplier, partner, funder, or other party with whom CRDF Global conducts business, or may conduct business. Covered Parties shall discourage the giving of gifts by any supplier, partner, funder, or other party.
- In certain circumstances (see Section 6 below), Covered Parties may accept an unsolicited gift provided it is of nominal value and is not intended to, or perceived to be intended to, influence the recipient in their official capacity with CRDF Global.
- Covered Parties shall not accept cash or cash equivalent regardless of value.
- Covered Parties shall not accept any single gift above nominal value at any one time and may only accept gifts from the same party totaling less than US $50 in a single 12-month period (Maximum Annual Value).
- Covered Parties may accept occasional business meals or food and refreshments provided that it directly relates to the conduct of CRDF Global business AND is of nominal value.
- Covered Parties may accept supplier or other party promotional items of nominal value as long as the item(s) are (a) in good taste and (b) are freely given by the supplier or other party to anyone requesting them.
- Covered Parties shall not offer a gratuity to any government employee or official on behalf of CRDF Global.

Notwithstanding the above, Covered Parties shall NOT accept or offer any gift or gratuity that might influence or be perceived to influence a business decision or action on the part of the recipient.

Personnel with questions on this policy should direct them to the Risk Management & Compliance Department Violation of this policy will constitute grounds for disciplinary action including termination of employment, cancellation of contractual relationships, or other actions as may be deemed appropriate by CRDF Global.

2. Purpose

Offering or accepting gifts, gratuities, and entertainment can appear to be an attempt to influence the recipient into favoring a particular customer, vendor, consultant, or the like. While gifts and other similar business courtesies are not uncommon in the course of business, Covered Parties must take all reasonable care to prevent potential violations of regulatory or ethical guidelines. This policy outlines CRDF Global's expectations with regard to ethical conduct and transparency, in keeping with international legal obligations as well as our commitment to doing the right thing.

3. Definitions

Covered Party	Any employee, consultant, partner, subcontractor, supplier, or other party conducting business on behalf of CRDF Global.
Gift	Merchandise, products, personal services, favors, or other material consideration
Gratuity	Gratuities are defined as meals, drinks, gifts, expenses, cash, or any other item of value, including personal service.
Maximum Annual Value	The total cumulative value of gifts accepted from a single party to a the same recipient in a 12-month period.
Nominal Value	Less than USD $20

4. Scope

All CRDF Global personnel, subcontractors, consultants, or other parties conducting work on CRDF Global's behalf are subject to this policy.

5. Exclusions

A "gift" does not include items such as:

- Modest items of food and non-alcoholic beverages such as soft drinks, coffee, tea, cookies, or similar items offered other than as part of a meal.
- Items of little intrinsic value and intended primarily for presentation such as plaques, certificates, trophies, and greeting cards.
- Discounts and prizes available to the general public or to all employees equally.

In some international business transactions, it is customary and lawful for business leaders in a host country to give gifts to CRDF Global employees. These gifts may be of more than nominal value and under the circumstances returning the gifts or paying for them may be an affront to the giver. In such a situation, the gift must be reported to the Risk Management & Compliance Department. In all other instances where gifts cannot be returned and offering to pay for them would adversely affect continuing business relationships, supervisors\managers must be notified. In some cases, the gift may be retained by CRDF Global, at its sole discretion, and not the individual's.

CRDF Global works with many international partners and taking cultural norms into account, reasonable token gifts may be exchanged between partners or affiliates and CRDF Global employees as long as they are not meant to influence business decisions.

Expenses for meals as part of a seminar, convention, or similar event are not within the definition of gratuities for purposes of this policy. Invitations extended by a customer or supplier to participate in any program or activity, such as a party or football game should be referred to your supervisor/manager for approval on a case-by-case basis.

Gifts exchanged between individuals with pre-existing personal relationships and given in a personal context outside the scope of the business relationship are not subject to this policy.

6. Additional Content

Due to the broad range of business situations encountered daily by CRDF Global personnel, this policy does not seek to cover every possible scenario that an individual may encounter. The expectation is that all CRDF Global personnel are professionals with the capacity to exercise sound judgment. A decision to accept or decline invitations or gifts requires common sense and careful judgment. Personnel must carefully weigh the business interest involved against the possible public perception. The following guiding questions should be considered prior to accepting a gift:

- Who is the partying giving/receiving the gift? Supplier/Customer, Government/Commercial, International/Domestic? It is critical to understand who is giving/receiving the gift or gratuity as the nature of the parties involved entail differing levels of risk.

Giving Party	Receiving Party	Risk
Supplier	CRDF Global	
CRDF Global	Supplier	
Government	CRDF Global	
CRDF Global	Government	
Private Sector Partner	CRDF Global	
CRDF Global	Private Sector Partner	

- Is it clearly related to the conduct of business?
- Is it moderate, reasonable, of nominal value, and in good taste?
- Would you feel comfortable owning up to the giving or receipt of this gift in front of other customers and vendors? Other employees? Your manager? Your family? The media?
- Do you feel any pressure to reciprocate or grant special favors as a result of this gift?
- Are you certain the gift does not violate any law or business regulation?

If, having weighed the above questions, personnel are still uncertain about specific situations, they should consult their supervisor to obtain an objective perspective of the situation and should always choose the most cautious approach to avoid even perceptions of impropriety.

7. Related Documents

CRDF Global Policies, Processes, and Procedures

Related Policies	Related Processes	Related Procedures
Anti-Bribery and Anti-Corruption Policy		Gift Reporting Procedure (forthcoming)
Procurement Policy		
Business Development Policy		
Code of Conduct		

External References

External Reference	Description