

## **Gifts and Entertainment**

Our company's gift policy is a no-gift policy. To avoid a conflict of interest, or the need for our employees/committee/board members to examine ethics of acceptance, our company & its employees/committee/board members do not accept gifts from any individual or organization under any circumstances.

Our company code of conduct requires that all employees/committee/board members demonstrate our organization's commitment to treating all people & organizations, with whom we come into contact or conduct business, impartially. Waterford Leader Partnership Ltd.'s employees/committee/board members demonstrate the highest standard of ethics & conduct. Employees/committee/board members practice & demonstrate equal treatment, unbiased professionalism, and non-discriminatory actions in relation to all individuals or organizations.

### Company No-Gift Policy Standards & Requirements

As one effort to demonstrate our commitment to these standards & behaviour, all employees must abide by the following no-gift policy requirements.

- No gifts of any kind that are offered by individuals or organizations, no matter the value, will be accepted by employees/committee/board members, on or off the work premises. By 'gift' Waterford Leader Partnership Ltd. means any item including pens, hats, t-shirts, mugs, calendars, bags, key chains, portfolios, as well as items of greater value.
- The no-gift policy includes food, beverages, meals or entertainment such as sporting events.
- The no-gift policy includes any business courtesy offered such as a product discount or any other benefit.

### Gift Policy Exceptions:

-Exempted from this policy are gifts such as t-shirts, pens, trade show bags & other items that employees obtain, as members of the public, at events such as conferences, training events, seminars, & trade shows, that are offered equally to all members of the public attending the event. This includes attendance at & food, beverages & items provided at events, exhibitor trade shows, press events, & parties funded by conference or event sponsors.

-Exempted are cards, thank you notes, certificates, or other written forms of thanks & recognition.

-Exempted is food, beverages, & moderately priced meals or tickets to local events that are supplied by & also attended by current customers or suppliers in the interest of building positive business relationships. This moderately priced entertainment is provided as part of a 'working' meeting or session to benefit & advance positive working relationships & company interests. These activities are expected to be reciprocated by our company in turn.

Employees/committee/board members are required to inform individuals & organizations of this no-gift policy, & the reason the company has adopted the policy. Employees/committee/board members will request that members respect our policy & not purchase & deliver any gift for our employees/committee/board members, at any time, for any reason.

If an employee/committee/board member does receive a gift;

-If feasible, the gift is returned to the vendor.

-If not feasible to return the gift, the gift must be raffled among all employees. Any proceeds from the raffle will be donated to charity & if the employees are uninterested in the item then the gift will be donated to charity.

-Plants or flowers will be displayed in the lobby, or at another central location where all may enjoy their presence.

-Gifts of food that may arrive belong to the entire staff even if addressed to a single employee.

This policy is supplemental to other company codes of conduct, ethics, standards, values & policies in the employee handbook & in other company documents.

If any employee/committee/board member has questions about or needs clarification of any aspect of this policy, then the employee should check with their coordinator/financial controller/CEO.

Breach of the Gift Policy may result in disciplinary procedures.