

Oklahoma Business Ethics Consortium
Gift Acceptance Policy

It is the policy of the Oklahoma Business Ethics Consortium (“OK Ethics”) to achieve the highest standards of integrity in all relationships and to ensure that third parties with whom its officers, directors, and staff associate exhibit the same degree of commitment to that standard. In support of that policy, it is important to make sure that these relationships that are unencumbered by gifts or activities that might be construed as an improper incentive.

Officers, directors, and staff of OK Ethics must avoid the direct or indirect receipt or solicitation of gifts, entertainment, or other favors from individuals or companies that exceed what is generally considered common courtesy associated with ethical business practices. Receipt of such a gift might be regarded as placing the recipient of the gift under some obligation, or perceived obligation, to a third party dealing with OK Ethics.

Accepting gifts, entertainment or other favors from individuals or companies can result in a conflict of interest when the party providing the gift or entertainment does so under circumstances where it might be inferred that such action was intended to influence or possibly would influence an officer, director, agent or employee of OK Ethics in the performance of his or her duties.

Gifts of cash are strictly prohibited; however, this does not preclude the acceptance of items or entertainment of nominal value (having a monetary value of less than \$100 per gift or occasion) that are not related to any particular transaction or activity of the organization. Because the frequency of the acceptance of gifts could create the appearance of impropriety, the total value of gifts, entertainment or favors from one source should not exceed \$150 in a year.

The following criteria should be considered in determining whether it is appropriate for an individual to accept a gift, entertainment or other favor:

- It was unsolicited
- It is of a nominal value (having a monetary value of less than \$100 per gift or occasion, or a total value of less than \$150 per year from one source)
- It is not a gift of cash
- It is consistent with accepted good business practices
- It cannot reasonably be construed as an improper attempt to influence a business decision
- It would not negatively impact the reputation of OK Ethics
- It is not reasonably considered to be extravagant or excessive

In certain situations, there may be a legitimate business purpose or reason to accept a gift or entertainment that would otherwise be contrary to this policy. However, if a gift does not meet the criteria listed above, the gift should not be accepted without the prior authorization of OK Ethics’ General Counsel or Compliance Officer.

Individuals to whom gifts, entertainment or other favors are offered are required to complete a Declaration Form (see attached).

**Oklahoma Business Ethics Consortium
Declaration of Gift or Entertainment**

Individual to whom gift/entertainment was offered:

Name	
Title/Position	

Description of gift/entertainment:

General description of gift/entertainment	
Date gift/entertainment was offered or received	
Estimated value of gift/entertainment	
Purpose of gift/entertainment	
Person(s)/organization providing gift/entertainment	
Relationship or prospective relationship with person(s)/organization offering gift/entertainment	
Acceptance of gift/entertainment? (circle one)	Yes / No
If gift/entertainment was declined, explain why	

Signature	
Date of Declaration	

Please complete this form and return to the OK Ethics Compliance Officer.