



CAN YOU WINE AND DINE US? WELL...MAYBE.

Guidance on granting and receiving benefits from International partners, including gifts, hospitality and invitations to events.

YES, IF:

- The gift is appropriate and reasonable
- It's lawful, meaning the gift or event is documented and transparent, like an invitation and/or agenda.
- Valued under \$50, for physical gifts
- Valued under \$100 per person, for hospitality and events

For more information, see the International [Code of Conduct for Business Partners and Suppliers](#), or contact your International representative with any questions.

NO, IF:

- Cash or cash equivalent
- Includes adult entertainment
- Of vacation nature
- It's solicited
- It's made with a promise in return, which could appear as a bribe or kick back
- It's offered or given during contract negotiations or renewals, to avoid the appearance of a potential conflict of interest.
- It looks like they influence a decision or action
- It involves government or public officials

PROCEED WITH CAUTION:

- When gifts and entertainment are above the green light thresholds, employees must seek written approval prior to accepting or granting the benefit.
- Note: benefits provided to a personal contact of individuals (significant other, family, friends) and/or travel offered to an individual or personal contacts (flight, hotel, transportation) are generally not acceptable and require special approval from the Corporate Compliance Team.