

## **POLICY ON GIFTS & ENTERTAINMENT**

### **Rules on Gifts and Entertainment**

Gifts and Entertainment are a normal part of business life, but it is important to ensure that we are aware and sensitive to the fact that Gifts and Entertainment (including tickets and invitations to Sports Events) can present increased reputation risk, even if a person giving or receiving has honourable intentions.

Your good judgement and ethical standards are therefore important when giving and receiving Gifts and Entertainment. Simply following applicable laws and regulations may not be enough in this context: Reputation risks can easily arise and the negative perceptions that can arise from providing or receiving seemingly lavish Entertainment and Gifts can be highly damaging and can be difficult to justify and live down.

The principles set out in this Policy are obligatory and outline what is acceptable when giving or accepting Gifts or Entertainment; but if you ever are in any doubt, do not hesitate to contact the CEO before accepting or giving a Gift or Entertainment.

This Policy is also designed to support everyone with a formal IMMAF role in pre-empting situations, where giving/receiving gifts/entertainment would create any reasonable expectations of favours in return, while at the same time appreciating the cultural importance of gifts in many countries as a token of appreciation of a good business relationship and social events as an important means of building and maintaining good working relationships.

This Policy, whilst rightly expecting the highest ethical standards of members of IMMAF's Internal Organs must strike the right balance of appreciating the voluntary nature of their role and the fact that their paid day-to-day jobs might sometimes be subject to different expectations regarding gifts and entertainment.

Providing and receiving Gifts and Entertainment must always be moderate and tasteful, respectful of cultures and gender.

Gifts given by IMMAF and received by IMMAF staff must never be more than nominal tokens of regard or appreciation, modest and reasonable in context. For example, giving or accepting a low value item or a branded gift after participating in a conference would be acceptable.

Gifts or Entertainment may never be made in such a way that they could be interpreted (or intended) as bribes or other improper forms of compensation, inducement or payment.

### **Applicability / Scope**

This Policy applies to all IMMAF employees, Contractors, Directors and Members of IMMAF. Internal Organs such as the Board and Committees ('IMMAF Staff').

### **IMMAF Gift and Entertainment Register**

An IMMAF Gift and Entertainment Register is to be maintained by the IMMAF. Every time a member of IMMAF Staff receives or gives any gift/entertainment, (s)he must make an entry into the Register. The IMMAF Gift and Entertainment Register is to contain the following information

about any gift/entertainment given or received by anyone with a formal IMMAF role: Date, person/organization giving, person/organization receiving, nature of gift/entertainment, monetary value of gift/entertainment. If the monetary value of the gift/entertainment required prior written approval, the entry also has to include the name and date of the person providing approval.

The Register is to be made publicly available on request. If IMMAF's Ethics Committee finds that applicable personal data protection laws or best practices prescribe it, the names of persons giving/receiving gifts and entertainment can be anonymized in the publicly available version of the Register. All entries in the Register are subject to review by IMMAF's Financial Audit Committee reviews entries for members of SIGA's Ethics Committee.

### **Rules on Gifts**

Giving and receiving directly or indirectly any cash Gifts, loans or any such similar Gifts (such as vouchers, store cards or any cards of value) are prohibited without exception.

Gifts offered by customers, suppliers and other third parties should not be accepted if the actual or imputed fair value exceeds £50GBP. All gifts will need to be accounted for on the IMMAF Gift Register.

IMMAF staff should not contribute anything of value (including employee time and resources) to a political campaign or party without the prior written consent of the Ethics Committee.

There are times when it may not be possible for IMMAF Staff to decline a Gift without causing offence. In such circumstances, Gifts that exceed £50GBP may be accepted at the time of giving but they must be disclosed in the SIGA Gifts Register and disposed of by being given to a charity or raffled/auctioned so that the proceeds can be donated to charity.

Most national governments and many regional and local jurisdictions have laws that restrict Gifts and Entertainment for Public and Quasi- Public Officials and, in many instances, also their Immediate Family members. Even an unintentional and seemingly innocuous deviation from this policy can expose IMMAF and possibly IMMAF staff to regulatory fines and penalties, reputational risk and even criminal penalties.

### **Rules on Entertainment (including tickets to Sport Events)**

Where IMMAF is offering the Entertainment, then at least one IMMAF staff member must be present during any Entertainment; otherwise it is a Gift, and subject to the Rules on Gifts.

Entertainment may be offered and accepted as long as it is within a business context and there is no conflict of interest or the possible perception of such a conflict.

Entertainment should always be modest and reasonable. Where IMMAF Staff are extending Entertainment, all expenses must be approved according to applicable rules and internal controls and recorded properly in IMMAF's books.

Accepting any Entertainment or invitation to Sporting Events that is likely to be lavish or perceived as such or is an exclusive or high-profile event such as a Gala Dinner as part of an awards ceremony or any other similar entertainment should be carefully reviewed by the invitee together with the CEO or, where applicable, the Designated Ethics Officer. The review must consider whether there is any business element associated with attendance (such as networking to

increase IMMAF's membership) and this must be weighed against any possible negative reputation risks. Risk mitigation measures should also be actively considered and implemented wherever possible and could include (but are not limited to) making a charitable donation corresponding to the value of the Entertainment. All Entertainment accepted must be entered into the IMMAF Gifts Register.

### **Rules on Gifts and Entertainment**

IMMAF staff may not, directly or through a third party, offer, promise or give to, or request, agree to receive or request from, any third party or Public Official, including any and all sports-related organizations, leagues and their participants, any Gifts or Entertainment if:

- By doing so, the employee would violate this Policy;
- The Gifts and Entertainment could be perceived as a Bribe;
- Doing so is dishonest, illegal or misleading;
- By doing so, the recipient appears to be under obligation, or
- It is offered with the intent to influence or appear to influence, the Public Official or third party in any vote, action, inaction or decision, such as the allocation of funds or award of a contract.

### **Immediate Family and close friends**

Along the lines of the spirit of this Policy, IMMAF Staff are required to proactively inform the IMMAF CEO, if they become aware that any of their Immediate Family or close friends are about to receive gifts or entertainment of a nature that can reasonably be perceived to leave an IMMAF Staff member with an indirect obligation of a favour in return which relates to SIGA in one way or the other. Members of IMMAF's Ethics Committee and IMMAF's Financial and Audit Committee have to inform the Chair of IMMAF's Ethics Committee. The Chair of IMMAF's Ethics Committee has to inform the Chair of IMMAF's Financial Audit Committee.

### **Definitions:**

For the purposes of this policy the following are defined:

- Gifts and Entertainment – anything of value (including meals, entertainment and gifts) that personally benefits any individual or organization.
- Immediate Family – Spouses, domestic partners, spousal equivalents, children and/or dependents.
- Public Official – an elected or appointed official, or any other official or employee of any federal, national, state, provincial or local legislature, executive branch, or other government agency, commission, board, authority, public fund, or any other governmental or quasi-governmental entity, including:
- Any officer or employee of government (including, but not limited to, any military personnel), or any of its departments, agencies, incorporated entities, or political subdivisions (including, but not limited to, wholly or partly state-owned and state-controlled enterprises)
- Any director, officer, or employee of any legal entity or joint venture that is controlled (qualitatively or quantitatively) or significantly owned by a government (including, but not

limited to a military personnel) or any of its departments, agencies, political subdivisions, or incorporated entities (including, but not limited to, state-owned and state-controlled enterprises)

- Any officer or employee of any public international organization (including, but not limited to, The Organization for Economic Cooperation and Development, World Bank, United Nations, multilateral development banks, the International Monetary Fund, International Sporting Organizations including the International Olympic Committee, National Sporting bodies including national sports governing organizations)
- Any person that represents, or acts on behalf of, or in an official capacity for, any government or any of its departments, agencies, political subdivisions, or incorporated entities (including, but not limited to, state-owned and state-controlled enterprises), even if in an honorary capacity
- Any political party, party official, or candidate for political office
- Any member of a royal family or provincial or tribal government
- Any member of a legislative or judicial body including sports tribunals and courts of appeal.
- Anything of Value means anything having any value or tangible benefit at all including, but not limited to:
  - Cash and cash equivalents
  - Gifts (including, but not limited to, gifts or courtesies forming part of a local custom; wedding, funeral and personal gifts; jewellery)
  - Political contributions
  - Donations to charities or foundations at the behest of an Official or his/her family
  - Entertainment (including, but not limited to, Sporting Events as defined herein, meals and tickets to venues and events including events sponsored by Third Parties)
  - Travel and travel-related expenses Accommodation and hospitality
  - Ownership rights or interests in joint ventures or other entities
  - Inflated or excessive contract prices
  - Below market leases or rentals
  - Loans
  - Offers of employment (whether long-term or temporary), including consulting fees, speaking fees, or honorariums, scholarships, or internships.
  - Sporting Event(s) for the purposes of this Policy includes sports matches, fixtures, opening and closing ceremonies associated with games and sporting tournaments.

### **Charitable donations**

IMMAF may make charitable donations to registered charities. Donations to charities must be approved by the IMMAF Board, in advance of commitment and disbursement. All donations will be publicly disclosed on IMMAF website.