**HOSPITALITY AND GIFTS POLICY**

Document type - Policy

Applies -   to all programs and projects

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**General provisions**

The Policy of the CO "CF "SOS Civil Defense Headquarters" (hereinafter referred to as the Organization) on gifts and hospitality (hereinafter referred to as the Policy) is designed to build business relationships with contractors of the Organization, state and local authorities, Ukrainian and foreign partners on the basis of trust and reliable business reputation.

The purpose of this Policy is to provide a procedure to ensure that during the interaction with any third party all employees comply with applicable laws and regulations on the gift giving and hospitality, as well as with the Organization’s rules.

**Principles of the Organization's policy on gifts and hospitality:**

* The Organization does not prohibit giving or receiving gifts or hospitality as long as they’re reasonable and justified.
* All gifts or hospitality should be proportionate and appropriate, and they shouldn’t be unnecessarily lavish.
* Employees/volunteers of the Organization and partners should prevent the exchange of business gifts, that may be in the nature of undue advantage or lead to a conflict of interest;
* The Director, heads of structural subdivisions, employees and volunteers of the Organization shall refrain from offering business hospitality, gifts, if such business hospitality, gifts may be regarded as an inducement or readiness to commit a corruption offense, related to the activities of the Organization.

**Terminology**

In this Policy, the terms are used in the following meanings:

Business hospitality - representative events (e.g., business breakfasts, lunches, dinners, receptions conferences, cultural, sporting events and other events), reimbursement of travel expenses, accommodation, other types of expenses incurred by the Organization in order to establishing or establishing business relations or for any other purpose related to the activities of the Organization;

Business relations - relations between the Organization and a business partner related to the activities of the Organization that have arisen on the basis of a transaction or other activity and provide for duration of existence after their establishment;

Generally accepted notions of hospitality - actions that are perceived in a particular setting by the parties as a measure of compliance with the rules of etiquette, which is not related to previous actions or decisions taken by employees or actions or decisions made by employees or volunteers, actions that an employee or volunteer will take at the request of the donor, and the absence of a relationship of subordination between the persons;

Corruption risk - the probability of committing a corruption or corruption-related offense, other violations of the Law of Ukraine "On Prevention of Corruption", which will have a negative impact on the Organization's activities;

conflict of interest – the contradiction between the private interest of a person and his/her official in the Organization, which affects the objectivity or impartiality of his/her decisions and commitment or non-commitment of actions in the exercise of these activities;

unlawful benefit – money or other property, advantages, privileges, services, intangibles, any other intangible or non-monetary benefits which are offered, given or received without legal justification;

private interest - any interest of a person that provides for a benefit of property or non-property nature, including those caused by relations of close persons, friendly or other relations with individuals or legal entities, including interest arising from membership or activities in public, political, religious or other organizations.

**Criteria for acceptability of gifts and hospitality**

Giving and receiving gifts within the framework of establishing or maintaining business relations or for achieving another goal of the Organization's activities is allowed if it meets a set of the following criteria:

- it is not intended to influence the objectivity of any decision to enter into transactions, provide or obtaining services, information, or any other benefits for the Organization;

- does not constitute a hidden unlawful benefit;

- meets the generally accepted concept of hospitality;

- the value does not exceed the limits established by law (the value of such gifts does not exceed one subsistence minimum for able-bodied persons on the day of acceptance of the gift, one-time, and the total value of such gifts received from one person (group of persons) during the year does not exceed two subsistence minimums established for able-bodied persons as of January 1 of the year in which the gifts are accepted);

- disclosure of a gift or business hospitality will not create a risk to business reputation of the Organization or the recipient of the gift or business hospitality;

- it is prohibited to give and receive gifts in the form of cash or non-cash, cash equivalent (gift cards or gift vouchers).

**Responding to inappropriate gifts and hospitality**

If a gift or business hospitality does not comply with the rules of this Policy or generally accepted notions of hospitality, an employee or volunteer of the Organization is obliged to politely return the gift (reject the hospitality), and if this is not possible, inform the Organization’s supervisor.

Employees or volunteers of the Organization in case of receiving a business gift or offer that may be in the nature of an improper benefit or lead to a conflict of interest, they are obliged to immediately take the following measures:

- refuse the offer/gift;

- if possible, identify the person who made the offer/gift;

- involve witnesses, if possible;

- notify their supervisor of the offer.

In case of detection of a business gift that may be in the nature of an unlawful benefit or lead to a conflict of interest, an employee or volunteer of the Organization is obliged to immediately, but no later than one business day, notify their supervisor about this fact.

**Memo for employees and volunteers of the Organization on gifts and hospitality**

Before offering or accepting a gift, ask yourself if these gifts:

**-** areexcessive or disproportionate in nature?

- are linked to an agreement to or not to do something?

- are cash or cash equivalent (e.g., gift certificates or vouchers)?

- are likely to make you feel uncomfortable if you have to report them to a senior manager?

- could be seen as improper influence?

- are likely to be embarrassing if they become public knowledge?

- are made or received during a tender, contract review period, or other time-sensitive matter?

If in doubt about the acceptability of a gift or business hospitality, employees or volunteers should contact their supervisor for advice and/or clarification.

Director of CO "SOS Civil Defense Headquarters"