

ROSE FITZGERALD KENNEDY GREENWAY CONSERVANCY, INC.

EMPLOYEE GIFT POLICY

No employee of the Conservancy shall accept any gift or other benefit that reasonably appears to be given in exchange or as a reward, for any accommodation in connection with soliciting, negotiating or maintaining a business relationship with the Conservancy. Employees may usually accept the following without violating this rule:

- Modest business entertainment the regular charge for which is less than \$50.
- Modest gifts offered on account of a family or personal relationship upon a holiday or commonly recognized personal event, such as a wedding or promotion, the regular retail value of which is less than \$50.
- Benefits available to the general public on the same terms.

Any exceptions to this rule must be pre-approved in writing by the Chair of the Finance and Audit Risk Management Committee. The Executive Director and the Finance and Audit Risk Management Committee shall have the authority to require that any gift be returned or the cost of any entertainment be refunded if determined to be not in the best interests of the Conservancy.

No Conservancy personnel may give or offer to give any form of bribe or kickback to any government official or other person in order to secure preferential treatment in connection with Conservancy business. Modest business entertainment or promotional materials complying with Conservancy guidelines that are not intended to secure preferential treatment are generally acceptable; however, no meal, gift or entertainment exceeding \$50 in value may be provided by any employee to any government official or any employee of a governmental agency without the prior written approval of the Executive Director or the Finance and Audit Risk Management Committee.

Nothing contained in this Gift Policy shall preclude the acceptance by the Conservancy and authorized personnel acting on behalf of the Conservancy, from accepting gifts and donations to the Conservancy.

(Name)

Date