

GIFT POLICY

to be included with the
Personnel Policy Handbook and the Ethics and Corporate Compliance Policy

Revised and approved by the BOD: September 1, 2022

GIFT POLICY: Gifts, Favors and Payments To Others:

Gifts, favors and payments may be given to others at SSV's expense if they are consistent with accepted business practices, are of sufficiently limited value and are in a form that will not be construed as a bribe or payoff. All such gifts, favors and payments must not be in violation of applicable laws, are generally accepted ethical standards and that public disclosure of the facts will not cause embarrassment to SSV.

GIFT POLICY: Gifts, Favors and Entertainment For Employees:

CUSTOMER GIFTS: Employees and members of the Board of Directors will not seek or accept for themselves any gifts, favors and/or entertainment without a legitimate business purpose. Employees and volunteers may accept common courtesies usually associated with customary business practices including t-shirts, pens, trade show bags and all other tchotchkes that employees obtain, as members of the public - at events such as conferences, training events, seminars, and trade shows - that are offered equally to all members of the public attending the event. Employees may also accept food, beverages and moderately priced meals or tickets to local (Western Massachusetts) events that are supplied by and also attended by current customers, partners and vendors in the interest of building positive business relationships. Any exceptions to this policy must be pre-approved by the Executive Director or the Chairperson of the Board of Directors.

It is never permissible to accept a gift in cash or cash equivalent, including gift cards, from any supplier or vendor.

SUBORDINATE GIFTS: Management and members of the Board of Directors should not accept gifts from those under their supervision of more than limited value. The exception to this is a gift to recognize a "life event" (wedding, graduation, birth of a child, retirement etc.)

CLIENT GIFTS: Employees should not accept any gifts or services that benefit them personally from clients and/or client's family members without approval from the Executive Director. Gifts given by the client and/or their family members that benefit a group of clients and their support staff or the program as a whole can be accepted. The exceptions to this is: (1) a gift certificate for no more than \$50 in recognition of a staff member's commitment to an individual client and it is given no more than once per year; and (2) a gift to recognize a "life event" (wedding, graduation, birth of a child, retirement, etc.)