

Gift Policy	Policy Number: PA-108
Last Reviewed: 2019/09/01	Next Review: 2020/09/01

Purpose: To establish a uniform policy relating to the acceptance of gifts, including gratuities or rewards, in order to maintain a high level of transparency and business ethics in line with the Pinnguaq Association mandate.

Policy Statement: No Pinnguaq Association employee may accept any gift from those who have, or are likely to have business with the Pinnguaq Association. In determining whether someone is likely to have business with the Association, officials and employees are encouraged to err on the side of caution.

Scope: This policy applies to all executives and management as well as all employees of the Pinnguaq Association.

1. **Definitions:**

- 1.1. “Employees” include all permanent, part-time, temporary and contract employees, including volunteers.
- 1.2. “Business with Pinnguaq Association“ means that, within 12 months of offering a gift, the would-be gift giver 1) has or will submit a bid or proposal to Pinnguaq Association to perform services or provide supplies or equipment, 2) has or will submit an application for a grant, service or endorsement of any kind; 3) any individual who is a client (recipient of services) either directly or indirectly.
- 1.3. “Gift” means any bestowal of money, any item of value, service, loan, thing or promise, discount or rebate for which something of equal or greater value is not exchanged. Payments for travel, entertainment and food are gifts.
- 1.4. “Gift” does not include any discount or rebate made in the regular course of business and offered to the general public without regard to the individual’s connection with Pinnguaq Association.
- 1.5. “Gift” does not include services, items of value, or bestowal of money that is presented to an individual but meant for the use of the organisation as a whole towards its mandate.

2. **Exceptions:**

- 2.1. Pinnguaq Association officials and employees may accept meals and sundry promotional items 'swag' provided in the course of workshops and conferences attended with the view of furthering Pinnguaq's mandate as long as the value of those items and meals is under \$20.00 per meal and \$10.00 per promotional item.
- 2.2. Pinnguaq Association officials and employees may accept edible gifts of nominal value (less than \$50.00) that are shared with a wide range of colleagues at the Association.
- 2.3. Pinnguaq Association officials and employees may accept items that can be displayed in public areas of Pinnguaq's building (such as flowers).
- 2.4. Pinnguaq Association officials and employees may accept handmade items by and from children under age 16.

3. **Procedures:**

- 3.1. Pinnguaq Association, and its officials and employees, will take steps to publicize this policy to the public, vendors and others.
- 3.2. Upon being offered or receiving a gift prohibited by this policy, an individual must notify the gift giver of this policy and graciously decline or return the gift.
- 3.3. If the gift is anonymous, the recipient must deliver the gift to the Pinnguaq Association Executive Director, who will convey the gift to a charitable organization.