



Innovations for Poverty Action	Gifts and Entertainment Policy	
Owner: General Counsel/ Chief Compliance Officer	Revision Date: 05/24/17	Revision No.: V1

Purpose

This policy has three purposes: 1) to preserve Innovation for Poverty Action's (IPA) impartiality, employees are restricted from receiving or giving gifts, including entertainment, which might give an appearance of favoritism; 2) as employees of a charitable organization, employees should not financially benefit from their positions within IPA, other than receiving their salary and benefits paid to them; and 3) to comply with applicable laws and regulations, and donor requirements regarding gifts and entertainment.

IPA's Expectations

In addition to ensuring that IPA complies with applicable laws and regulations and donor requirements in relation to gifts and entertainment, conducting business without providing or receiving lavish gifts and entertainment is a fundamental component of the Code of Conduct (the Code) and our overarching corporate values. Any violation of this policy may provide reasonable grounds for employee discipline, up to and including termination of employment. If at any time a member of IPA's community requires more information, has any questions, suggestions or concerns, please contact the General Counsel/ Chief Compliance Officer, Stacey Daves-Ohlin at sdavesohlin@poverty-action.org.

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1.0 Definitions

- 1.1 Employees: The term **Employee** used in this policy includes all IPA directors, officers, and staff.
- 1.2 Business Unit: A **Business Unit** is a department within the U.S. Headquarters office (e.g., Human Resources, Finance, Legal, Policy and Research, Global Programs), a branch office outside the U.S., or a local entity, which is under the **Control** of IPA.
- 1.3 Control: **Control** means the possession, directly or indirectly, of the power to direct or cause the direction of management or policies of an entity, whether through ownership, directorship, or membership, or by contract or agency or other similar arrangement.
- 1.4 Gifts: **Gifts** is defined in the broadest sense and includes money, securities, business opportunities, goods, services, discounts on goods or services, entertainment, tickets, rides, company sponsored events, food, drink and any similar items.
- 1.5 Obligate: **Obligate** is defined as expecting or appearing to expect one to take or not take a certain action or make a certain decision.

2.0 Policy

- 2.1 Gifts may not be accepted or provided if it obligates an employee, or *appears* to obligate an employee, to the person receiving or giving the gifts.
- 2.2 In addition, employees may only accept gifts which comply with all relevant laws and the specific restrictions set forth below:
- Employees should never accept gifts from suppliers/vendors, clients, partners or other stakeholders which exceed the lesser of (a) \$50 USD per gift or (b) ½ employee's daily rate of base salary per gift. In the aggregate, employees should never accept gifts from a particular supplier/vendor, client, partner or other stakeholder, which exceed the lesser of (x) \$100 USD per calendar year or (y) one day of the employee's daily rate of base salary. Gifts valued in excess of the aforementioned limits, should be declined or donated to IPA if refusing such a gift would cause insult to the giver.

- Employees are also restricted in giving gifts to stakeholders. Government employees in the U.S. and in other countries are subject to varied, complex rules and laws, which often forbid them from accepting most items of value. For example, U.S. government executive branch employees (e.g., State Department, USAID and USDA) may not accept gifts exceeding \$20 USD on a single occasion, and not exceeding \$50 USD in a calendar year. In addition, many donors also have rules relating to giving or accepting gifts. Prior to providing any gifts to any government official or to an officer, director, employee, agent, representative, or consultant of a commercial entity or donor, please ensure that such gift complies with the applicable law, commercial entity's policies, donor's policies and IPA's Anti-bribery Policy. If there are any questions regarding such compliance, please contact IPA's General Counsel/ Chief Compliance Officer.

2.3 The following are **not** allowed, regardless of the value:

- accepting or giving anything in return *for* the gift
- accepting or giving cash (including checks, gift certificates or cards, securities and loans)
- accepting or giving a gift that violates any law, regulation or IPA policy (e.g., the Anti-bribery Policy) or may bring harm to IPA's reputation
- providing entertainment that is lavish or too frequent for suppliers/vendors, clients, partners or other stakeholders (whether existing or prospective)
- accepting gifts from, or giving them to, any donor, consultant or supplier/vendor during a procurement process, whether or not the employee is in charge of the procurement activities or involved indirectly in the procurement negotiations
- accepting or giving anything that could be viewed as a bribe, payoff or improper influence (see IPA's Anti-bribery Policy)
- using the employee's position in any way to obtain anything of value from prospective or existing suppliers/vendors, clients, partners or other stakeholders or persons to whom the employee refers business

3.0 Responsibilities

3.1 All IPA Employees

All IPA employees have the responsibility to report any actual or suspected violations of this policy in accordance with the IPA Whistleblower Policy. Willful blindness or conscious disregard for suspicious violations may be viewed as a violation of this policy and treated accordingly.

3.2 Business Unit Management

Business Unit Management have an affirmative obligation to be familiar with the requirements of this policy, and to be familiar with the relevant laws of the local countries in which they operate.

3.3 Legal Department

The Legal Department will:

- coordinate with other compliance functions, e.g., Finance, Human Resources, etc.;
- periodically review this policy, and where required, assist the General Counsel/ Chief Compliance Officer in conducting investigations of allegations involving violations of this policy;
- coordinate with local counsel and subject matter experts on questions involving gifts to governmental officials; and
- provide assistance to the General Counsel/ Chief Compliance Officer in management of gift policy training and issues.

4.0 Examples/Questions and Answers

Q: An old school friend who happens to work for a company with which IPA does business is visiting me. She has asked if she can take me out to dinner to thank me for showing her around town. Can I go to the dinner?

A: The meal would be allowed. Gifts are permitted if based upon obvious family or long-standing, personal relationships (such as those between you and your parents, children, spouse, or a childhood friend), where the circumstances make it clear that those relationships are the motivating factor for the gift, rather than the business relationship.

Q: An IPA office has booked a conference at a hotel that IPA has procured through the appropriate procurement process and has already signed the contract with the hotel. After the contract is signed, and before the

conference, to show its appreciation, the hotel manager offers me a free room valued at \$75.00 USD for one night, may I accept it?

A: You may not accept the hotel room for your personal use, but you may ask the hotel manager if you may apply that one room towards the conference costs to decrease the total cost for IPA.

Q: IPA is conducting a training session and I would like to invite a local government official and offer to provide his meals free of charge. May I do that?

A: You may provide modest/inexpensive meals that are provided to all attendees of the training. For any other situation, you must seek clearance from IPA's General Counsel/ Chief Compliance Officer, as it may violate local law.

Q: I have been offered six tickets to a sporting event by a supplier/vendor. The tickets are individually worth \$20.00 USD. Can I accept the tickets?

A: No. The total value of tickets exceeds the permitted limits.

Q: A supplier/vendor often offers promotional items to a nominal value, such as pens, calendars, paperweights and other office supplies. Can I keep these items?

A: Yes, you may keep these types of items as long as the value of the gifts when given does not exceed the lesser of (a) \$50 per gift or (b) ½ your daily rate of base salary per gift and the total annual value is (x) less than \$100 USD or (y) one day of your daily rate of base salary.

Q: I received a ceremonial item from one of the organizations, which IPA has helped. The value is probably greater than \$50 USD. Can I keep the gift and display it in my home office?

A: No, the value of the gift exceeds the limits permitted by IPA. The gift must either be returned to the donor, or given to IPA if returning the item to the donor would be impossible or the donor would be offended. IPA may, however, display it in its office as an office asset.

Q: I'm hosting a dinner for a few of the organizations who have worked with IPA in my region. One of the guests I was going to invite works for the local government. Do I have to notify anyone?

A: Yes. You must get clearance to invite this guest from IPA's General Counsel/ Chief Compliance Officer. Many countries have restrictions on what, if any, gifts and entertainment may be accepted by governmental employees.

Q: I am traveling to a different country where my supplier/vendor has a home. He has asked me to stay with him for a night. Can I stay in the supplier/vendor's home?

A: No. Staying in the home of any supplier/vendor is inappropriate. This type of entertainment could be viewed as improper and could bring harm to IPA's reputation if disclosed to the public. You should thank the person for the kind suggestion, explain our policy and politely decline the offer.

Q: To commemorate the completion of our latest project, I plan to provide a small gift (approximately \$10.00 USD) to each of the major participants, including some representatives of the local government and the U.S. government. Is this permissible?

A: You must ensure that providing a gift to a government employee does not violate any applicable laws. IPA's General Counsel/ Chief Compliance Officer, with support from local counsel, will assist you in a making this determination.

Q: A donor in the coffee industry wants to give me one of the coffee makers they manufacture, may I accept it?

A: No, but if it would offend the donor to tell him that IPA's Gift and Entertainment policy will not allow you to accept such a gift, then it should be brought to the IPA office to be used by all IPA staff.

5.0 References

IPA's Code of Conduct can be found at on Box

IPA's Whistleblower Policy and Procedure can be found on Box

IPA's Anti-bribery Policy can be found on Box

IPA's Whistleblower Hotline is www.lighthouse-services.com/poverty-action or +1-844-837-5445.