Purpose

The purpose of this policy is to establish guidelines for acceptance of gifts, gratuities and honoraria that might arise in the course of Holy Cross College employees' relationships with vendors, consultants, contractors, donors and others providing goods or services to Holy Cross College. This policy does not seek to unreasonably restrict or interfere with maintaining good relationships with such outside entities, but rather seeks to establish guidelines for ethical business practices and provide direction for disclosing offers and receipt of such items and to ensure that Holy Cross College's interests are not compromised.

Employees of the College are expected to conduct business according to the highest legal and ethical standards. For the protection of the College, as well as the employee, employees must maintain a high degree of integrity in dealing with all past, current, and potential vendors providing goods and services to the College.

As a basic condition of employment, all Holy Cross College employees have a duty to act in the College's best interest in connection with business relationships arising from or related to their employment at Holy Cross College. This duty means that employees must not engage in any business practice that will interfere with their obligations to Holy Cross College, damage Holy Cross College's reputation, compromise the independence of Holy Cross College's business activities, or reasonably be seen as doing so.

Policy

In general, acceptance of any gift or gratuity by Holy Cross College employees from outside entities, other than those specifically mentioned as exceptions in this policy, is prohibited.

This policy prohibits a business courtesy offered such as a product discount or another benefit if the benefit is not extended to all employees. This includes merchandise, cash, services, entertainment and other courtesies. It is essential to both the College and its suppliers that all decisions and actions regarding purchasing are based upon proper business considerations and are not influenced in any way by personal obligations. Employees should discourage vendors and donors from providing gifts.

In no circumstances may an employee personally profit from a gift regardless of value, such as the selling of the gift. For example, selling of textbooks, admission tickets or gift cards.
Gifts and Gratuities

However, minor non-monetary gifts may be received and accepted in the interest of maintaining positive business relationships with vendors, consultants and contractors, subject to compliance with the guidelines enumerated below.

Guidelines

1. **Value Limitations**
   Non-monetary gifts with a value of $25.00 or less may be accepted without disclosure, subject to the remaining guidelines.

2. **Disclosure Process**
   Any Holy Cross College employee must fully disclose, in writing, receipt of any non-monetary item with a value of $25.00 or more.

   All disclosures required by this policy must be in writing from the employee to the department/unit head or to the appropriate Holy Cross College vice president as soon as possible after offer or receipt of such items. (email is an acceptable form of communication in writing) Disclosures should provide details including name of the donor, item description and estimated value. The department/unit head or appropriate Holy Cross College vice president shall respond in writing to acknowledge the disclosure and identify the recommended disposition.

3. **Gift Sharing**
   Perishable gifts such as fruit baskets or other edible gifts that cannot easily be returned should be shared or distributed equally among all department employees. Other gifts that are approved for acceptance such as tickets, golf outing invitations or convention and seminar admission fees should be rotated among all department employees.

4. **Gift Solicitation**
   Except for college fund-raising activities where gift solicitation has been formally approved, Holy Cross College employees are strictly forbidden from soliciting gifts of any type or value for themselves, their family, friends or favorite organizations.

5. **Examples of Acceptable Gifts**
   Include, but are not limited to
   - Calendars, desk novelties, or similar advertising items of less than $25.00 in value (this dollar limit will be reviewed and revised in accordance with IRS limits on business gift deductions);
   - Reasonably priced meals accepted in settings where College business is conducted;
   - Textbooks, recorded media, software, or similar work-related items for which the college is not being charged. Desk copy of textbooks are acceptable without disclosure regardless of value.
   - **Acceptance of monetary or near-money items such as cash, gift cards, gift certificates, business credits, tokens and other cash substitutes is strictly prohibited.**
     However, gift cards and gift certificates that may be used by the receiver’s department for operating supplies or equipment may be accepted provided acceptance is approved by the
department head. Disclosure guidelines must be followed even when accepting such gift cards and certificates for department use.

8. **Participation in Sponsored Activities**
   Any employee who participates in vendor sponsored events or activities during the regular work day must have the approval of the appropriate administrative supervisor. Such participation may require the time away be charged as vacation leave.

9. **Donor relationship**
   Any employee who is involved with fundraising or solicitation of funds from a donor must not accept any gift which could result in personal gain. All business practices comply with the **Ethical Principles and Standards** set by the Association of Fundraising Professionals (AFP). Including:
   
   - practice their profession with integrity, honesty, truthfulness and adherence to the absolute obligation to safeguard the public trust
   - act according to the highest goals and visions of their organizations, professions, clients and consciences
   - put philanthropic mission above personal gain
   - adhere to the spirit as well as the letter of all applicable laws and regulations
   - advocate within their organizations adherence to all applicable laws and regulations
   - avoid even the appearance of any criminal offense or professional misconduct
   - bring credit to the fundraising profession by their public demeanor
   - encourage colleagues to embrace and practice these ethical principles and standards
   - be aware of the codes of ethics promulgated by other professional organizations that serve philanthropy

**Responsibility**: Chief Financial Officer