



## **Addendum I**

### **Gifts and Hospitality Acceptance by Employees**

#### **Purpose of the Addendum Guidelines:**

This Addendum is considered an integral part of the Bethlehem University “Conflict of Interest” (COI) Policy (no.ADM.03.01).

The following guidelines are intended to establish a minimum standard for all University employees to promote appropriate standards of conduct, keeping them free of any obligations or commitments and thereby avoid COI situations. The guidelines are designed to assist employees to recognize actual and/or potential conflicts of interest that may arise with respect to the acceptance of gifts or hospitality from suppliers, contractors or any other parties so that they can, in good faith, disclose, manage and resolve such situations.

#### **Guidelines:**

In general, the acceptance of significant material gifts or special favors by an employee of the University from anyone doing business with, or soliciting business from the University, is not permitted. The only exceptions to this are minor gifts and token courtesies that do not place, or do not have the appearance of placing, the recipient under any obligation when making decisions on the University’s behalf. In no event should an employee accept a gift or hospitality on the understanding that his/her position will be used to influence any decision related to University’s operations whether administrative or academic. Employees shall disclose to their supervisor the offer or receipt of such gifts or favors, and no employee shall pursue his or her own interest at the expense of the University.

#### **1. General Principle:**

When an employee is offered a gift or hospitality, he/she shall discuss the offer with his/her immediate supervisor. After consultation with the relevant Vice President (or Vice Chancellor if the employee is a Vice President), the immediate supervisor will then decide whether the acceptance of the gift or hospitality places, or appears to place, the employee under any obligation. In making the determination, a variety of factors should be considered, including but not limited to:

- i. Whether the gift or hospitality is provided before or after the employee makes a decision concerning, or provides a service to, the party who is offering the gift.
- ii. The value of the gift or hospitality is greater than (NIS 100).
- iii. The frequency of the offers to or acceptance of token gifts or hospitality by the employee concerned.
- iv. Whether the offering or receipt of a gift or hospitality is a matter of cultural or diplomatic protocol.
- v. If still remains in doubt, refer the whole issue to the Human Resources office.



## **2. Acceptable Gifts and Hospitality:**

The following guidelines describe the circumstances in which gifts or hospitality will normally be deemed to be acceptable:

- i. An employee may accept gifts of small intrinsic value to a maximum value of (NIS 100) per any one party per year.
- ii. An employee may keep a gift/prize if it is offered to attendees at a conference, seminar or trade show.
- iii. An employee may accept plaques or similar recognition awards if offered in his/her name.
- iv. An employee may, with the approval of his/her relevant Vice President, accept an invitation from a third party to attend an educational seminar where the event presents educational value to the employee. The frequency of such acceptances should be considered to avoid appearances of conflict of interest or commitment.
- v. Attendance with suppliers'/contractors'/consultants' representatives at luncheons, dinners or other meetings which have been discussed with and approved in advance by the employee's relevant Vice President, provided that the employee uses caution with respect to the frequency of these occasions.

## **3. Declining Gifts or Hospitality**

- i. If an employee is offered or receives a gift which falls outside of these guidelines, it should be declined or returned in a tactful manner.
- ii. If the nature or value of an offered gift or hospitality is such to raise concern as to the good faith of the party offering it, the employee shall advise his/her immediate supervisor and the relevant Vice President (or Vice Chancellor if the employee is a Vice President) before receiving it.

## **4. Exception**

Any exception to these guidelines has to be approved by the Vice Chancellor on a case-by-case basis. A written request (e.g. email) in this regard has to be submitted to the Vice President for Human Resources. Documenting giver and receiver of gifts.