



LET'S DO THE RIGHT THING

Policy on gifts, hospitality and entertainment

Dos	Don'ts
<ul style="list-style-type: none">✓ Gifts, hospitality or entertainment that are occasional and modest are a legitimate tool for favouring good collaborative relationships between F.I.S. and other subjects, and as such are permitted.✓ In general, F.I.S. recommends favouring the offer of gifts from the F.I.S. Gadget Catalogue, which promote the F.I.S. brand, contacting the Communication Office.✓ Where gifts, hospitality, or entertainment of modest value, i.e., not exceeding 100 euros and in line with normal business practices, are offered or received, they may be accepted.✓ As an example, some acceptable gifts include ballpoint pens, calendars or diaries.✓ As an example, acceptable acts of hospitality or entertainment can include dinner at a restaurant, tickets for a sporting event, theatre performances or concerts in the presence of the host.✓ A useful question to ask when accepting or receiving is: Would I be comfortable about telling my Direct Superior about it? Is it reasonable, proportionate, not excessive? Would F.I.S. be willing to reciprocate?	<ul style="list-style-type: none">✗ Offering or accepting gifts, hospitality or entertainment is forbidden, if it is believed they can compromise an objective judgement, influence a decision in an unsuitable manner or create a sense of obligation.✗ Offering or accepting gifts or hospitality or entertainment, no matter their worth, during negotiations for a tender or a contract with third parties is forbidden.✗ Separating a gift, hospitality or entertainment into various parts so as to reduce its economic worth (e.g. a crate of wine), and in doing so have it return within the limit value, is forbidden.✗ Under no circumstances may gift of money or equivalent means (e.g. gift vouchers) be given or accepted, regardless of the value.✗ Offering or accepting gifts, hospitality, or entertainment repeatedly to the same third parties, and repeatedly accepting from them, is forbidden (e.g. meals, tickets or invitations to sporting, cultural or social events).✗ Gifts, hospitality and entertainment offered to the families of employees must always be refused, no matter their worth. Similarly, it is prohibited offering them to family members of any third party in the course of their duties.✗ If it is believed that refusing gift, hospitality or entertainment can be interpreted as an insult, it is necessary to contact the Legal Office and the Internal Audit.

To learn more, refer to the Complete Policy available on the Corporate Intranet

Attention: please for Gifts, Hospitality or entertainment from or to Public Officials refer to the specific procedure.

