



## **GIFTS, ENTERTAINMENT, MEALS AND TRAVEL PRINCIPLE**

### **Principle Statement :**

During the course of our work, we may provide or accept business gifts, entertainment, meals, or travel. Exchanging business courtesies in this manner helps us strengthen our relationships with Business Partners and provide them with information about GTG's products. When done within established limits, these activities continue to be a lawful and appropriate business practice. When dealing with customers, partners, government officials, and/or health care professionals (HCPs), employees must ensure they offer, give, and receive gifts, provide meals or entertainment, and pay for travel only if it is of reasonable value, complies with the recipients' own laws and corporate regulations, is not given with any corrupt intent to improperly influence the recipient's actions or decisions, and is infrequent.

Any gift or entertainment provided to a third party under this Principle must be properly reflected in the books and records of the GTG business unit or subsidiary that provides it.

### **Purpose :**

This Principle helps ensure that GTG conducts these lawful business practices consistent with GTG's Code of Conduct, complies with all applicable laws and rules, and that accurate books and records are kept reflecting these expenses.

This Principle applies globally to all employees and may apply to those acting on behalf of GTG. See the Compliance Principle for information on when a third party might be covered by the Code of Conduct Principles.

### **Additional Guidance :**

- **BUSINESS COURTESY:** For purposes of this Principle, a gift, meal, travel opportunity or entertainment will be referred to as a "business courtesy." The term "gift" means any gift, gratuity, favor, benefit, discount, forbearance, or other tangible or intangible item having monetary value for which the recipient does not pay fair market value. A "gift" also includes meals, drinks, entertainment and recreation (tickets, passes, etc.), services, training, transportation, discounts, promotional items, lodging, gift cards, or door prizes.
- No GTG employee may give or receive a business courtesy that violates the law, regulations, contracts or agreements, or reasonable customs of the marketplace.
- Gifts of items in quantities intended for personal use that are marked with GTG promotional labeling are generally appropriate.
- Properly record any business courtesy on the business unit's books and financial records. The record must comply with any policies of the specific GTG business unit.
- When deciding on the appropriateness of giving or receiving a business courtesy, employees should consider:
  - o How it compares in value to the usual gift-giving practices in the applicable industry and country;
  - o Whether any legal or regulatory restrictions exist;
  - o The total value of business courtesies to or from that person or entity in the current year;
  - o The suitability of the business courtesy given the GTG employee's position at GTG;
  - o The impact of the business courtesy on building positive business relations with the recipient or provider of the business courtesy; and
  - o Whether an objective party would consider the business courtesy to be reasonable in cost and quantity or to be extravagant.





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- This Principle applies even when personal funds or assets are used and no reimbursement from the company is sought. Any time the business courtesy may be seen as being given on behalf of GTG, this Principle must be followed.
- If an employee intends to offer, or is offered a business courtesy that could be viewed as excessive under this Principle, the employee must receive advance approval from his/her supervisor, who, in turn, should consult with the business unit's assigned legal counsel, the Ethics & Compliance Department, and/or Government Contract Compliance.
- Supervisors are responsible for reviewing the appropriateness of business courtesies offered or provided by GTG employees. A supervisor's approval of expense vouchers or an approval given by other means, indicates that a review was completed and the supervisor determined the business courtesies provided were appropriate. Supervisors must ensure they take the needed time to understand the details regarding any business courtesy and follow all existing processes for giving their approval.
- In this principle, the term "Government Official" is broadly defined to include a broad range of individuals:
  - o Government employee or elected or appointed official;
  - o Political party;
  - o Candidate for political office (even if not currently in office);
  - o Employees of a government or agency (police, tax and customs inspectors);
  - o Professors who work at government affiliated universities;
  - o Health care professional (e.g., doctor, nurse, dentist, hospital administrator) who works in a public or government-sponsored health care program (e.g., state-owned university hospital, government-funded dental program);
  - o Consultant, speaker, or advisor retained by GTG who is a government employee;
  - o Government employee who benefits from a GTG research grant;
  - o Official or employee of a public international organization such as the United Nations, World Trade Organization, OECD, Red Cross, Organization of American States, International Monetary Fund and the World Bank; and
  - o Employee of a quasi-public agency and other companies or organizations partly or wholly owned or controlled by a government
- In this principle, a Health Care Professional (HCP) is broadly defined as any person or entity (a) authorized or licensed to provide health care services or items to patients, or (b) who is involved in the decision to purchase, prescribe, order, or recommend medical products, technologies and related services and solutions. HCPs include individual clinicians (for example, physicians, dentists, orthodontists, nurses and pharmacists, among others), provider entities (for example, hospitals, ambulatory surgical centers, pharmacies and durable medical equipment suppliers) and administrative personnel of provider entities with purchasing, formulary, or practice policy-making responsibilities (for example, hospital administrators and purchasing agents, group purchasing organizations, dental service organizations). Entities broadly involved in the health care services industry that are owned by HCPs should also be considered HCPs for purposes of this definition. This definition does not include healthcare professionals who are bona fide employees of GTG, while acting in that capacity.
- Any business courtesy provided to or received from a Health Care Professional (HCP) raises additional risk and may be prohibited by law. The laws, regulations and industry codes that govern Health Care Interactions, including the payment or provision of anything of value such as Gifts, Meals, and Entertainment are complex and differ from country to country. GTG has established both a regional and country guidance structure that governs our interactions with Health Care Professionals (HCPs) throughout the world. You must read, understand and be familiar with the applicable policies, procedures and codes. See Interactions with Health Care Professionals Policy. You must consult and seek guidance from Health Care Compliance when questions arise.





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- In general, modest items of food and refreshment, such as soft drinks, coffee, cookies, fruit, rolls or doughnuts, when not served as part of a meal, or when provided in a buffet opened to multiple people, are permitted business courtesies for government employees. If the government employees seek to make reimbursement, we can provide written receipts to them. Work with Staff or Business Unit controllers to credit the government employee's payment to GTG.
- Giving or receiving money or cash equivalents such as gift cards, gift certificates or vouchers almost always violates this Principle. In limited and defined circumstances, within special conditions, GTG policies and procedures may permit such gifts, but employees must consult with the business unit's assigned legal counsel and the Ethics & Compliance Department before acting. When in doubt, play it safe and avoid giving or receiving such gifts.
- Do not give or receive business courtesies that are too costly or too frequent to be within the customs of the marketplace or business situation. Such extravagant courtesies almost always will violate this Principle.
- Do not give or receive business courtesies that are intended to, or even appear to, improperly or corruptly influence a decision relating to GTG. Bribery and kickbacks are illegal and violate this Principle.
- Do not offer a business courtesy that would violate the recipient's company or agency policy.
- Do not give or receive entertainment and recreation, such as tickets to a sporting event, where a representative of the company offering the business courtesy will not accompany the recipient to the event. For example, this Principle prohibits giving a customer four tickets to a professional sports game when no GTG employee will attend the game with the customer.
- In the U.S., federal, state and local government regulations on business courtesies are complex and vary among government agencies. Do not offer or provide business courtesies to government employees in the United States unless it is clearly permissible under applicable laws and regulations. Consult with Government Contract Compliance or your business unit's assigned legal counsel if you have questions. Also, avoid offering or providing business courtesies to employees or representatives of other countries' governments, unless approval is obtained via established anti-bribery due diligence and approval processes in the applicable subsidiary. Offering or providing a business courtesy that exceeds the restrictions may constitute a criminal offense, regardless of whether the business courtesy is funded by GTG or personal funds.
- Do not give any business courtesy to reward a government employee for any decision that employee makes.
- Do not hold raffles or other "give-aways" to a group that is principally comprised of government officials who could not accept the raffle or give-away prize if it were offered as a gift. (For example, raffling an iPad to the attendees at the International Chiefs of Police convention.)

**Penalties:**

Violations of the law and GTG's Code of Conduct will result in discipline, up to and including termination from employment.

