

## VI.D. GIFT POLICY

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(Source: *Division of Human Resources, Almanac*, July 17, 2007 (<https://almanac.upenn.edu/archive/volumes/v54/n01/gift-policy.html>))

In order to avoid a conflict of interest or the appearance of a conflict of interest, at no time should an employee solicit or accept personal gifts from current or potential vendors, contractors or their agents, local businesses, University departments, or others with whom there is a potential or ongoing business or professional relationship. Employees may accept ordinary business courtesies, such as payment for a modest meal or event, or gifts which are promotional items without significant value and which are distributed routinely. If the value of the gift is undetermined, it should be returned.

Gratuities or gifts of money to the employee cannot be accepted at any time and should be returned immediately to the donor.

All employees are responsible for becoming familiar with and adhering to this policy. In addition, supervisors are responsible for ensuring that this policy is known by their employees and that all employees are following it.

In the decision as to whether or not to accept any gift, employees should use good judgment and avoid in all cases any actual conflict of interest or the appearance of any conflict. For example, University officials are often offered goodwill gifts when on a mission abroad, visiting other domestic institutions, or when officials from other institutions visit Penn. Because a refusal of a gift could offend the hosting officials, such gifts can be accepted. If the gifts are of significant value (i.e. greater than \$100, consistent with IRS policy), they become the property of the University and should be discussed with the head of the department.

Employees who have questions regarding this policy or who are uncertain as to whether a conflict of interest exists should confer with their supervisors or the Division of Human Resources.