1. Definitions

In this policy, unless the context otherwise requires:

a) “ARC Committee” means the ITF Audit, Risk and Compliance Committee.
b) “Directors” means members of the ITF Board of Directors.
c) “Gifts” means something given willingly to someone without payment. It may be tangible or intangible. It can be on a single occasion, multiple occasions, or can be ongoing (such as discounts on goods or services).
d) “Hospitality” means generous and friendly treatment of visitors and guests by a host. It includes the host paying for a meal, accommodation, expenses, or activities outside ordinary business.
e) “Staff” means ITF employees and contractors (i.e., self-employed persons who have contracts of service with the ITF), as well as chairs and members of ITF committees and working groups.

2. Purpose

This policy sets out our expectations of what is and is not acceptable when it comes to receiving a gift or accepting hospitality. It provides guidance to our directors and staff about what is and is not appropriate to accept as a present, offering, reward, token of appreciation, or hospitality from or to a current or potential member, staff member, vendor, supplier, stakeholder, or other party. It also sets out the procedure directors and staff must follow when receiving gifts and accepting hospitality.

This policy is about open and transparent operations and governance. It is about proactively disclosing gifts and hospitality, to manage actual and perceived conflicts of interest, so our members know that all staff and directors are working in the interests of the ITF.

2.1. To whom this policy applies?

This policy applies to volunteers acting in an official capacity for the ITF, such as Board and Committee Members. It also applies to full-time and part-time employees on a substantive or fixed-term contract, and to associated persons such as contractors and other self-employed persons under a contract of service with the ITF.

2.2. Why does the ITF have a policy about gifts and hospitality?

This policy does not necessarily prevent receiving a gift or accepting hospitality. The timing and appropriateness of a gift or hospitality is meant to show appreciation, not to obtain favours. However, accepting a gift or hospitality can create a conflict of interest, or perceived conflict of interest, no matter how well-intentioned it is. It can also influence a person’s decision-making. A gift or hospitality should never be accepted if it were to influence your decision-making or if you think that the person giving the gift or hospitality is trying to influence your decision or behaviour.
For example, if a supplier takes Board Members out for a meal before they sign a contract to supply goods to the ITF, it may be intended to influence the decision. If the meal is after the contract is signed, it can be a celebration, to show appreciation. However, if the meal is at the most expensive restaurant in the city, and the supplier gives each Board Member a gold watch, this may be intended to influence future decision-making, and would be inappropriate. Another example is if the host of a seminar gives course instructors a cultural gift, and takes them out for a meal, it may be appropriate — unless the magnitude of the gift or hospitality is extravagant.

3. Behavioural compliance with the policy

There are various ways to show behavioural compliance with the ITF policy about gifts and hospitality. Here are some examples:

a) We consider the implications of accepting a gift or hospitality before accepting it.
b) Before accepting a gift or hospitality, we ask ourselves whether or not accepting the gift or the hospitality will create expectations that could give rise to a conflict of interest (real, apparent or potential).
c) We keep a register for all gifts and hospitality received with a value of €100.00 or more. If we do not know the value of a gift or hospitality, we estimate the value conservatively.
d) When we do not know for sure if it is appropriate to accept a gift or hospitality, we err on the side of abstaining or declining.
e) We avoid soliciting or accepting gifts, rewards, benefits or hospitality which might compromise the integrity of the individual or the ITF.
f) We avoid accepting a gift or hospitality that could be, or could be perceived by others as, either an inducement or a reward which might place us in a conflict of interest or under an obligation to a third party.
g) We avoid accepting gifts or hospitality that breach the ITF’s conflict of interest policy.

4. Process

a) Consider

When we are offered a gift or hospitality, we consider the following:

• How the gift or hospitality would look to an outside party;
• The reasons for the gift or hospitality being offered;
• The frequency of the gift or hospitality (a small gift or hospitality given repeatedly may create a conflict);
• Whether the gift or hospitality displays a company or organisation logo and how that brand aligns with ITF values;
• The value or importance of the gift or hospitality to the recipient; and
• The cultural context or etiquette.

b) Decide

When we are offered a gift or hospitality, we decide whether to accept or decline the gift or hospitality:

• We graciously accept a gift or hospitality if it does not contravene the ITF Gift and Hospitality Policy, and the giver does not appear to expect or require anything in return that has not already been agreed appropriately.
• We respectfully decline a gift or hospitality if accepting it creates a conflict of interest (be it real, apparent, or potential) that cannot be successfully managed;
• If declining a gift or hospitality has the potential to insult the giver,
we do one of the following:
• carefully explain that it contravenes (or may contravene) the ITF Gift and Hospitality Policy, and respectfully decline the gift;
• accept the gift on behalf of the ITF, and give it to the ITF;
• accept the gift and share it with all ITF staff and volunteers, insofar as possible;
• accept the gift, raffle it, and give the proceeds to charity;
• accept the gift and donate it to charity; or
• accept the gift and keep it, and donate money to charity of the approximate value of the gift.

c) Record

When we are offered a gift or hospitality, we record the gift or hospitality:
• If a gift or hospitality is or may be valued over €100.00, we record it in the ITF Gift Register.

d) Seek approval

When we are offered a gift or hospitality, we seek approval for significant gifts or hospitality:
• If the value of a gift or hospitality is or seems significant, we seek approval from the Chair of the Committee (for committee members), the Secretary-General (for staff or contractors), from the President (for Board Members), or from the Audit, Risk and Compliance Committee (ARC Committee, for the President and Executive Committee).

5. Controls to check compliance

a) Our ARC Committee review the Gift Register at least every six months.
b) If any gifts or hospitality are considered inappropriate, a representative of the ARC Committee will discuss it with the staff member or director involved. Where possible, the gift is returned.
c) If a member of the ARC Committee becomes aware of a gift or hospitality that is not on the Gift Register, a representative of the ARC Committee will discuss it with the staff member or director involved.
d) The ARC Committee will provide regular training and communication to ensure all staff and directors understand and comply with this policy.

6. Approval and version control

This policy was approved by the Board of Directors on [enter date].

<table>
<thead>
<tr>
<th>Date</th>
<th>Description</th>
<th>Version</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>