



LAKESHORE

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I. PURPOSE

Lakeshore Foundation is committed to sustaining an ethical workplace free of conflicts of interest and perceived conflicts of interest. Lakeshore Foundation therefore has adopted this Gifts and Entertainment Acceptance Policy to provide instruction to all employees, Board members, committee members, task force and hearing panel members, contractors, and volunteers who conduct business on behalf of and with Lakeshore Foundation (for purposes of this policy referred to as Lakeshore Foundation Individuals, or LFI), as well as their spouses and immediate family members, regarding how to handle offers of gifts or other forms of entertainment from individuals or companies that do business with or are interested in doing business with Lakeshore Foundation. This policy should not be considered in any way as an encouragement to make, solicit or receive any type of gift or entertainment. These individuals may not, under any circumstances, actively solicit any type of gift or entertainment. Further, Lakeshore Foundation will not under any circumstances permit or authorize participation in any business gifts or entertainment that might be considered lavish, inappropriate, or illegal.

II. POLICY

This policy is applicable to all employees, Board members, committee members, task force and hearing panel members, contractors, and volunteers who conduct business on behalf of and with Lakeshore Foundation, as well as their spouses and immediate family members.

GIVING AND RECEIVING BUSINESS COURTESIES

A. Current Business Partners, Members and Guests

Lakeshore Foundation Individuals listed above may give or accept gifts to or from individuals and companies that currently do business with, or make donations to Lakeshore Foundation as follows:

- 1) Partner/sponsor/supplier products (e.g., logoed jackets) with a value of up to \$500 per LFI, per year, per individual/company.
- 2) Other gifts with a value of no more than \$100 per LFI, per year, per individual/company.

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3) Invitations for the LFI to attend an event with an individual/company representative including travel to and from such events only to the extent approved in advance by Lakeshore Foundation’s President/CEO or COO/CFO.

4) On an infrequent basis, invitations for a spouse or family member to join the LFI at sporting events with an individual/company representative.

B. Prospective Business Partners

Lakeshore Foundation Individuals may give or accept gifts from individuals and companies that are prospective business partners as follows:

- 1) Gifts with a value of not more than \$100 per LFI, per year, per individual/company;
- 2) Invitations for the LFI to attend an event with an individual/company representative (but not travel to and from such events).

Disclosure and Approval

Any gifts, potential gifts or invitations extended that exceed the limits and/or parameters noted above must be disclosed to and approved in advance and in writing by the President/CEO or the Board Chair, as appropriate, before they may be accepted.

All invitations that involve the third party paying for the LFIs’s travel and/or overnight accommodations, must be promptly reported to the CEO/President and COO/CFO. Where the gift or invitation is made to the President/CEO of Lakeshore Foundation, the required disclosure must be made to the Board Chair as appropriate. Prior to accepting invitations or gifts that include travel and/or overnight accommodations, written approval must be received from the President/CEO and COO/CFO. In the case of the President/CEO’s request for approval, such approval must be received from the Board Chair.

In addition, the President/CEO shall have the right, in consultation with the LFI, to require that any gift(s) be returned, donated to Lakeshore Foundation, or donated to another agreed upon charity if the President/CEO or the Board Chair believes that such gift(s) is not proper and/or creates an appearance of impropriety. Questions regarding this policy should be posed to the Director of Human Resources at (205) 313-7400.