## Central Florida Behavioral Health Network, Inc. Your Managing Entity

#### **POLICIES & PROCEDURES**

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#### **Gift Acceptance**

## **Policy**

It is the policy of Central Florida Behavioral Health Network, Inc. (CFBHN) to:

- Maintain the highest level of business ethics and integrity in all relationships;
- Avoid conflicts of interest, and/or the appearance of a conflict of interest; and
- Not accept or solicit anything of value as related to employment at CFBHN.

No CFBHN employee, nor a member of his/her family, is to personally benefit or receive anything of value from a vendor, supplier, and/or Network Service Provider (NSP).

#### Purpose

The purpose of this policy is to provide guidelines to employees in accepting or soliciting gifts from current and/potential vendors, NSPs and/or suppliers.

#### Procedure

- 1. CFBHN has a no-gift policy.
  - A. Employees are *NOT* to solicit or accept gifts, money, or gratuities of any kind that are offered by current and/or potential vendors, suppliers, or NSPs.
  - B. This includes the solicitation or acceptance of gifts on or off work premises. The no-gift policy includes product discounts, food, beverages, meals, and entertainment.
- 2. Gift policy exceptions:
  - A. Product discounts, food, beverages, meals, and entertainment when offered to all employees and approved by senior management.
  - B. Vendor and NSP-sponsored meals, refreshments, and items offered to all attendees at conferences and public events.
  - C. Staff may attend an event provided by a CFBHN vendor that is directly related to the business of CFBHN.
  - D. Moderately-priced meals and refreshments provided as part of a working meeting or event that promotes shared business interests.
  - E. Refreshments available as a courtesy to all visitors.
- 3. Gifts provided to an employee or department.
  - A. Employees/departments may receive gifts and/or tickets to events from vendors and suppliers (examples include: candy during the holidays, sponsorship to a conference, gift cards, etc.).
  - B. When possible, items are to be shared with all staff at the worksite.
  - C. If the gift cannot be shared with all staff, the Human Resources Business Partner and/or Consultant determines the most appropriate method to utilize the gift. In the absence of the Human Resources Director, the Chief Financial officer (CFO) or Chief Operating Officer (COO) serve in this capacity. Methods may include donating to a not-for-profit, raffle the gift to employees, or other appropriate method.

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- 4. CFBHN Standards of Business Conduct require all employees to exercise sensible judgment in every aspect of work that is performed, and when issues/questions arise, to discuss them with CFBHN management before taking action. If questions arise, the employee is expected to contact their supervisor or the Human Resources Consultant for direction and clarification.
- 5. Gifts/donations from community members: When gifts/donations are offered to CFBHN, the Chief Financial Officer (CFO) and President/Chief Executive Officer (CEO) are to be notified to determine the most appropriate way to proceed.

Gift Acceptance Date Issued: 09/05/2014

Approval: Last Revision: <u>08/28/2024</u>

Alan Davidson, President/Chief Executive Officer Review Date: 08/28/2024