

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/or potential vendors, NSPs, and/or suppliers.

Procedure

1. CFBHN employees are *NOT* to solicit or accept gifts, money, or gratuities of any kind that are offered by current and/or potential NSPs. 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. An exception to the no-gift policy may be granted in the following circumstances and with the permission of senior leadership:
 - A. Vendor and NSP-sponsored meals, refreshments, and items offered to all attendees at conferences and public events.
 - B. Event attendance offered by a vendor that is directly related to the business of CFBHN or an event at which CFBHN will be recognized.
 - C. Moderately priced meals and refreshments provided as part of a working meeting or event that promotes shared business interests.
 - D. Refreshments are 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. When possible, items are to be shared with all staff at the worksite.
 - B. If the gift cannot be shared with all staff, the Human Resources Business Partner determines the most appropriate method to utilize the gift. In the absence of the Human Resources Business Partner, the Chief Financial Officer (CFO) or Chief Operating Officer (COO) will serve in this capacity. Methods may include donating the item to a not-for-profit, raffle the gift to employees, or other appropriate methods.

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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 Business Partner for direction and clarification.
5. Gifts/donations from community members: When gifts/donations are offered to CFBHN, the CFO and President/Chief Executive Officer are to be notified to determine the most appropriate way to proceed.

Gift Acceptance Approval:  Alan Davidson, President/Chief Executive Officer	Date Issued: <u>09/05/2014</u> Last Revision: <u>06/24/2026</u> Review Date: <u>06/24/2026</u>
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