How can I tell if gifts and entertainment are OK?

Here’s a simple rule to help you remember our rules on gifts and entertainment. The “G.I.F.T.” rule:

* Government official
  + Is a government official involved? Is your client or beneficiary possibly a state-owned company? Or working for a governmental entity?
  + If so or if you’re not sure, contact your supervisor, Chief of Party/Team Leader or your Ethics and Compliance Officer.
* Intent
  + If you’re giving a gift to a client, what is your intent? Just a token of appreciation for his/her business the past year? Or are you giving something big to try to “buy” future business? Could this be misinterpreted that you have “corrupt intent”?
  + If vendors are entertaining you, would it look like they just want to properly develop their relationship with you and understand DAI’s business better? Or would it look like they’re trying to improperly influence you in deciding which vendor to select? If it became public, how would it look?
* Frequency and timing
  + How often is a supplier/vendor giving you gifts? Are they just occasional in nature and at appropriate times (such as the holidays or a customer forum) or does the supplier frequently send over fruit baskets, sports tickets, pastries or more? How much would the gifts and entertainment from that one supplier add up to over the year? Do the gifts tend to come exactly when you are deciding to whom to make an award? Are you starting to feel an obligation to the supplier/vendor because of all of the gifts?
  + Likewise, how often do you entertain your client: once a quarter or just for particular occasions? Or are you taking him/her out several times a month? Or many times just as you are trying to close a big deal?
* Too much?
  + How big is the gift or entertainment? Is it beyond what most people would consider nominal or modest? The other party’s limits?
  + Is it customary in your country?

As always, if you are not sure about whether some gift or entertainment opportunity is OK, check with your Ethics and Compliance Officer first. If in doubt, check it out. You can also consult the Code of Business Conduct and Ethics. If you keep these rules and tips in mind, you can help yourself, DAI, and our clients stay compliant when it comes to gifts and entertainment.

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