



POLICY OECG07

SPONSORSHIP OF GOVERNMENT TRAVEL POLICY

Version 8.0

Effective Date: 01-NOV-2014

Contact **Motorola Solutions Office of Ethics** policy owner [Terry Bell](#) if you have any questions, comments or suggestions regarding this policy.

PURPOSE

To establish guidelines for Motorola Solutions sponsorship of government travel and to ensure that all sponsorship of government travel is conducted in compliance with Motorola Solutions' Code of Business Conduct and applicable anti-corruption laws worldwide.

SCOPE

This policy is applicable to all Motorola Solutions employees on a worldwide basis.

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1.0 DEFINITIONS

- 1.1 [G7 system](#) – The internal online system which must be used to register all requests for Motorola Solutions sponsorship of government travel.

- 1.2 **Government** - Any agency, department, or other government entity of any national, regional or local public authority worldwide; includes any entities (companies, partnerships, etc.) that are directly or indirectly owned or controlled by a Government. Care should be taken to understand the nature of control and/or ownership of many of Motorola Solutions customers that may not appear to be a government entity.

Please note that business entities may be considered to be “controlled by” a government even though government ownership is less than 50%. The determination of government control should be made on a case by case basis, and requestors should err on the side of including businesses with substantial direct or indirect government ownership or funding in this process.

- 1.3 **Government Official** - Any Government employee, officer or agent, or any person acting in an official capacity on behalf of a Government. It also includes an official or employee of a public international organization, political parties, candidates for political office, and government owned or controlled entities.
- 1.4 **Sponsor** – The employee who proposes the travel and is responsible for ensuring compliance with this policy.
- 1.5 **Travel** - Includes both domestic (within the same country) and international travel that includes any of the following: logistics support, airfare, transportation, accommodations, per diem, incidentals, meal allowance or other items more than USD \$20 per person. Any sponsorship of U.S. Federal visitors, or political/campaign activities are included

regardless of value. Candidate visits to MSI facilities are governed by G-16 and related policies.

- 1.6 Third Party Sales Representative (TPSR):** any third party that sells or resells, or assists in selling or reselling any products manufactured or distributed by Motorola Solutions, or any services provided by Motorola Solutions.

2.0 STATEMENT OF POLICY

From time to time, Motorola Solutions sponsors travel by government customers and other government officials. Travel paid for, hosted or otherwise sponsored by Motorola Solutions must be for appropriate business purposes.

- Travel must be legal, related to Motorola Solutions business, and limit entertainment or recreation to a reasonable and allowable proportion.
- Government officials may be considered for Motorola Solutions sponsored business travel only if such travel does not violate their own law and/or rules.
- Review and approval of each trip is required in advance of the travel.
- This policy extends to all sponsored government travel, including travel paid for with a Government customer's money out of funds reserved for that purpose in a contract for sales of Motorola Solutions products or services, as well as travel sponsored in conjunction with any third party. Refer to section 2.1.11.
- G7 registrations are not required for nominal ground transportation when provided independent of a trip including air travel.

2.1 POLICY REQUIREMENTS

- 2.1.01** All Government Official travel paid for or sponsored by Motorola Solutions, directly or indirectly, including through a contract purchase by the Official, or sponsored in conjunction with any third party, must comply with this Policy.
- 2.1.02** Travel paid for or sponsored by Motorola Solutions must be for appropriate business purposes. Travel that is unrelated to Motorola Solutions business, has a disproportionate component of entertainment or recreation, or is illegal will not be approved.
- 2.1.03** Motorola Solutions will sponsor travel only where such sponsorship is permitted by the traveler's applicable laws, rules and regulations and all required procedures for approval of such travel under such laws, rules, and regulations have been complied with. The employee requesting sponsorship of the travel must make reasonable efforts to ascertain the necessary local rules and procedures in advance of the travel.
- 2.1.04** There must be a valid business purpose relevant to Motorola Solutions connected with each stop on the itinerary. Some typical business purposes for these trips include:
- Training related to the business; factory acceptance test; government relations activities; meetings and/or factory tour related to new system sale. Travel to locations typically considered tourist or vacation locations will be highly scrutinized for business relevance and are not likely to be approved.
- 2.1.05** No more than one business day (Monday-Friday) in each location may be spent on non-business events. The number of non-business days in a business week must be limited

and requests for more than one non-business day per work week will be given critical review. Legitimate travel time is not included in this restriction.

- 2.1.06** A Motorola Solutions escort should accompany the travelers during regular business hours and all Motorola Solutions-sponsored evening and weekend entertainment.
- 2.1.07** The length of the trip must be commensurate with the business purpose.
- 2.1.08** Use of the corporate jet for travel by Government Officials will not be approved unless clearly justified by extreme circumstances. Use of the corporate jet is also subject to the requirements of the Motorola Solutions Aviation Department "Procedures and Use of Motorola Solutions Aircraft." Approval under these procedures for use of the corporate jet does not suffice by itself as approval under this Policy. Reimbursement by any non-Motorola Solutions passengers on the corporate jet shall not be accepted without written approval by Legal, Government Affairs, & Corporate Communications (LGACC).
- 2.1.09** The timing of the trip must be reasonably connected with the timing of the business purpose. For example, if the Government Official is contemplating a particular system, a trip for the purpose of viewing a similar installed system should usually be made prior and reasonably close to the time when the contract is to be awarded or the equipment is to be installed. However, travel by decision makers immediately prior to or after the award of a contract or other decision related to Motorola Solutions should be undertaken only if absolutely necessary and should not contain any entertainment, recreation or touring.
- 2.1.10** The Government Official's designated ethics official (or the Government Official's supervisor if the organization does not have a designated ethics official) must be notified in writing of the purpose and items for which Motorola Solutions will be paying. The ethics official (or supervisor) must approve the Motorola Solutions payments, in writing, stating that the Motorola Solutions payment does not violate any rule or regulation of the organization or jurisdiction to which the Government Official is subject. See [Attachment A](#) for sample invitation correspondence.
- 2.1.11** Where travel is paid for in a customer purchase contract, LGACC and the Office of Ethics will review the language to determine if sufficient detail is provided regarding the travel to consider it already approved by the traveler's senior management. The Office of Ethics may, in its discretion, require further senior management approval or a contract amendment if the existing contract language does not sufficiently support the training.
- If a contract amendment or separate trip authorization from the traveler's senior management is necessary due to the general nature of the training provision in the original contract, the Office of Ethics will require that the appropriate level of management sign off on the amendment. An amendment signed by the traveler's Human Resources or training department will be considered acceptable only with a representation in the document that they have full authority to approve the specific travel under the government organization or entities' policies.
- 2.1.12** No spouses, family members or personal guests may accompany the traveler for any portion of the travel at Motorola Solutions expense. However, an invitation letter may be issued by Motorola Solutions in support of the visa application for the spouse, family members or personal guests who accompany the traveler at their own expense subject to the requirements in 2.1.14 below.

- 2.1.13** Payments of all approved expenses for airfare, transportation, meals, lodging, food, or incidentals are to be made directly by Motorola Solutions to the providers of service. No cash should be given or paid to a Government Official for use on such expenses.
- Sponsorship of travel that will require direct payment to or reimbursement of the Government Official for expenses incurred or to be incurred will be approved on an exception basis only; this will most often apply to technical training trips where the travelers are not escorted by a Motorola Solutions sponsor each day.
 - When the Sponsor submits invoices or other expenses related to a trip for payment or reimbursement, reference should be made to the approved OECG07 case number.
 - Payment of agencies or other third parties for travel packages requires detailed invoices with associated receipts as documentation.
- 2.1.14** Travel related to an external educational program sponsored by Motorola Solutions for Government Officials will only be approved in connection with a program previously approved in compliance with the specific requirements of Motorola Solutions [OECE09](#), Anticorruption Policy, which can be found at ethics.mot-solutions.com. OECG07 applications for such travel should make reference to the approved program documentation.
- 2.1.15** Class of travel provided to Government Officials should be commensurate with that provided to employees under the Global Travel Policy; First Class travel is not allowed, unless it is provided as a complimentary upgrade by the airline.
- 2.1.16** Gifts provided to the travelers must comply with the Motorola Solutions Code of Business Conduct and Gifts and Entertainment guidelines.
- 2.1.17** Travel must also comply with Policy [P-10](#) with regard to meeting and event arrangements as applicable.
- 2.1.18** Per diem payments to Government Officials are not a preferred form of sponsored travel expense and efforts should be made to discourage such payments. However, government customers may require that MSI make per diem payments to Government Officials traveling for MSI-related projects. Such payments may be permissible and are subject to local and national laws, including but not limited to the U.S. Foreign Corrupt Practices Act and the U.K. Bribery Act.

To the extent permitted or required by applicable laws and regulations, reasonable per diem payments to Government Officials for expenses associated with an approved travel plan under this policy must:

- comply with the limitations and restrictions of applicable laws and regulations;
- be modest and avoid being extravagant;
- be directly related to a valid business purpose; and
- be made without corrupt intent; i.e., not intended as a reward, payment, or gratuity for action or inaction by the receiving Government Official.

Per diem payment requirements should be memorialized in the contract documents and approved in advance by MSI legal counsel and the Office of Ethics, as well as the customer's ethics officer or other authorized representative. If possible, per diem payments should be made to the governmental agency or entity and not the individual Government Official. If MSI pays for travel expenses such as lodging, meals, entertainment, or incidentals, per diem amounts should be pro-rated and reduced accordingly.

MSI must accurately record all travel expenses, including but not limited to per diem payments, and ensure compliance with all applicable accounting and reporting rules.

- 2.1.19** G7 registrations must be completed when a Motorola Solutions TPSR is providing travel to a Government Official which is materially benefitting Motorola Solutions and includes material involvement by Motorola Solutions.

REGISTRATION PROCESS FOR SPONSORSHIP OF GOVERNMENT TRAVEL

- 2.2.01** The Sponsor requesting sponsored Government Official travel must submit an online request within the [G7 System](#) by providing all necessary information relevant to the travel.
- 2.2.02** The Government Official must be informed that any offer of travel is conditional on receipt of a fully approved G7 registration. In the event that the Government Official supervisor's approval document is in process, a conditional invitation to the Government Official will be extended, subject to the internal approval of the Government Official. Requestors are encouraged to submit the request at the earliest date, preferably at least three (3) weeks prior to travel, to ensure timely processing. **NO travel may take place until all required documentation and approvals have been obtained in the G7 System.**
- 2.2.03** The Sponsor is responsible for timely completion of the post-trip certification as required in the G7 System.

3.0 ROLES & RESPONSIBILITIES

Failure to comply with this policy is a violation of Motorola Solutions' Code of Business Conduct and is the basis for disciplinary action that may include termination of employment. In some cases, individual civil or criminal penalties may also apply.

- 3.1** **Approvers** – Approvers are responsible for performing diligent review of G7 registrations and ensuring the proposed sponsorship complies with this policy.
- 3.2** **Office of Ethics** – The Office of Ethics is responsible for maintaining this policy and the associated G7 system.
- 3.3** **Sponsors** - Sponsors are responsible for initiating the registration in the G7 system and completing all actions required by the G7 system and in accordance with this policy.

4.0 REFERENCES

Further guidance on this policy can be obtained from the resources listed below, and information on how to report any concerns can be found at ethics.mot-solutions.com.

- 4.1 Motorola Solutions Ethics Portal [Ethics Home](#)
- 4.2 Motorola Solutions Code of Business Conduct [COBC](#)
- 4.3 Motorola Solutions [G7 System](#)
- 4.4 Invitation Correspondence- Motorola Solutions Paid Travel by Government Employees [Attachment A](#)
- 4.4 Motorola Solutions Anticorruption Policy [OECE09](#)
- 4.5 Motorola Solutions Travel & Entertainment Expenses Policy [P-10](#)

5.0 APPENDICES

Appendix 5.1– Approval Authority and Issuance & Revision History

	Person	Function	Title
Policy Originator:		Motorola Solutions Office of Ethics & Compliance	
Reviewed By:	Michael Salzman	Motorola Solutions Office of Ethics	Director, Ethics
Approved By:		Motorola Solutions Office of Ethics	

Issuance & Revision History

Effective Date of Change	Revision Number	Summary of Change	Anticipated date for next review/revision
20-OCT-2000		Initial Release	
27-FEB-2003	1.0	Attachment A revised Added Attachment B	
26-MAR-2007	2.0	Attachment A removed and replaced with online government travel approval link. Added Section 4.0 Responsibilities Renamed Attachment B to Attachment A, Invitation Correspondence	
01-JUN-2007	3.0	Revised Section 2.11	

30-APR-2008	4.0	Substantive changes; converted to Corporate Standard Format Policy Renumbered from G-7 to OECG07	
25-MAR-2009	5.0	Added Sections 2.1.16-2.1.18 and 3.3, OEC Roles and Responsibilities Revised Sections 2.0, , 2.1.01, 2.1.05, 2.2.04, 2.2.05, and 2.2.07	
04-JAN-2011	6.0	Policy, hyperlinks, etc. updated to reflect business separation and name change from "Motorola" to "Motorola Solutions"; clarification at 2.2.07	04-JAN-2014
Effective Date of Change	Revision Number	Summary of Change	Anticipated date for next review/revision
01-MAR-2014	7.0	Policy reviewed per 3-year audit guideline. No substantive changes	01-MAR-2017
01-NOV-2014	8.0	Policy revised to refer to new G7 system.	01-NOV-2017