

OLG Internal

Acceptance of Gifts Guide



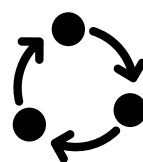
Entertainment



Hospitality



Tangible
Goods



Disclosure

Governance, Legal & Compliance

Introduction

In the right circumstances, a modest gift may be a thoughtful “thank you,” or a meal might help strengthen a business relationship. However, if not handled carefully, the exchange of gifts, including hospitality and entertainment can damage OLG’s reputation, especially if it happens frequently or if the circumstances are such that a reasonable person could think it is influencing a business decision.

This guide is to be read together with the general provisions in OLG’s Code of Business Conduct, Conflict of Interest Rules and the Ethics & Compliance Management Policy (collectively “the Rules”). The Rules address circumstances when the acceptance of gifts may affect, or appear to affect, OLGers objectivity or impartiality and create an actual or perceived conflict of interest.

A **conflict of interest** occurs when the personal or business interests of an OLGer or Board Member may be, or may reasonably be perceived to be, in conflict with his/her OLG responsibilities. Essentially, accepting a gift that would influence decision-making in a way that is not in the best interests of OLG.

What is considered a Gift?

A “**gift**” is defined as a benefit of any kind received by an OLGer, while acting in a professional capacity as a public servant, that is offered by a person, group, or entity that does business, or is seeking to do business with OLG; or to whom the OLGer or Board member provides services in the course of his/her duties at OLG. Gifts can include tangible goods/services, hospitality and/or entertainment.



Hospitality includes items such as food, beverage, accommodation, transportation, and other amenities. Examples include complimentary meals, drinks, hotel accommodations and car services. **Entertainment** includes invitations to a variety of activities, attractions, events, and performances. Examples include tickets or invitations to sports events, concerts, charitable events, or invitations to trade and industry-sponsored sporting events such as golf, tennis, or curling tournaments.

OLGers and Board Members are subject to legal requirements that govern ethical behaviour, including the acceptance of gifts, as set out in the Public Service of Ontario Act, 2006 and Ontario Regulation 381/07 (“the Requirements”).



OLG created a Code of Business Conduct and Conflict-of-Interest Rules to promote business integrity and compliance with the Requirements (collectively “the Rules”). This Guide provides additional guidance for OLGers and Board Members specifically related to the acceptance of gifts.

The Rules state that if a reasonable person might conclude that a **gift could influence an OLGer or Board Member when performing his or her duties to OLG**, the OLGer or Board member shall not, directly or indirectly, accept a gift.

Common Truths & Misconceptions

OLGers can't accept any gifts.

FALSE

OLGers may accept gifts of a nominal value (less than \$50.00) if a reasonable person may conclude that the Gift could not influence them while performing his or her duties for OLG.

Hospitality (e.g. meals or entertainment) may be accepted in occasional circumstances.

TRUE

Typically, meals and entertainment invitations should be declined. However, in occasional circumstances it may be appropriate to accept these gift offerings to advance commercial business needs of OLG. **Gifts should not be accepted at any time from vendors involved in an active competitive procurement, multi-party business deal or contract negotiations.**

OLGers must only consider the value of a gift to determine if it should be accepted or not.

FALSE

OLGers must consider the following Guiding Principles (as described on page 4):

- the value of the gift,
- how you came to receive, or offered the gift (circumstances),
- frequency of gifts from the same source,
- perception from the public should you accept it (will it embarrass OLG or employee if made public),
- whether it creates an obligation for the employee or OLG, and
- whether it could reasonably influence or appear to influence the employee's judgment or the performance

A Prohibited Gift, if accepted, **MUST** be returned to the entity or person offering it.

FALSE

It may be impractical to return a gift that has been accepted but should not have been. For example, it would not be practical to return sympathy flowers sent by a vendor to an OLGer that exceeded the nominal value. However, the gift must still be disclosed as a Prohibited Gift.

OLGers, at their sole discretion, can decide whether to accept a gift, regardless of the nature, value or type of gift.

FALSE




Deciding whether to accept a gift can be difficult. People Leaders and Compliance can help to ensure an appropriate decision is made. OLGers may accept gifts of nominal value (less than \$50.00) without prior approval. Otherwise, all other gifts require pre-approval by Divisional Leadership to accept.

Certain gifts must be disclosed through the Conflict of Interest Buddy App in Workday.

TRUE

If you accept a gift that you feel could create an actual or perceived conflict of interest, then you must disclose it as a Prohibited Gift. Otherwise, you must disclose all gifts valued at \$50.00 (or more) as a Discretionary Gift before accepting them.

What Gifts Are Allowable?

Type of Gift	Guidance	Disclosure
<p>Prohibited Gifts</p>  <p>NOT ALLOWABLE</p>	<p>A Gift of any value which appears to create a conflict of interest must not be accepted including:</p> <ol style="list-style-type: none"> Cash, gift certificates or gift cards convertible to cash, bonds, or negotiable securities; An OLG lottery or gaming product that the employee or Board Member would not be able to purchase directly; A loan other than on normal commercial terms provided by an entity in the business of lending; Payment or reimbursement for travel or lodging in any amount; Gifts solicited or provided with the expectation of receipt of a reciprocal benefit, including a Gift provided in exchange for preferred access, preferential treatment, or confidential information from OLG; Gifts that are inconsistent with usual business practice; or Gifts of any value if a reasonable person might conclude that the Gift could influence an employee or Board Member when performing their OLG duties. 	<p>A prohibited gift must be:</p> <ul style="list-style-type: none"> Declined If accepted, returned to the source with notice of OLG's Code of Business Conduct and Conflict of Interest Rules (if practical) and disclosed to OLG through the Workday COI Buddy App CEO & President and Board Chair acceptance of a Prohibited Gift must be disclosed to the Integrity Commissioner of Ontario
<p>Discretionary Gifts</p>  <p>MAYBE ALLOWABLE</p>	<p>A Gift with a cumulative value of \$50 (or more) that a reasonable person could not conclude would influence an OLGer or Board Member when performing duties for OLG.</p> <p>Divisional Heads and People Leaders must pre-approve to ensure that no conflicts of interest exist and are consistent with usual commercial business practices.</p> <p>One way to avoid perceived conflicts of interest is to ensure the Gift is not specifically targeted to one individual, such as being distributed through a random draw, donated to a charity event or benefiting a group of OLGers or Board Members in manner that would not reasonably be seen as influencing their judgement.</p> <p>Consider the factors on page 4 to determine if it is appropriate to accept a discretionary gift.</p>	<p>A discretionary gift must be:</p> <ul style="list-style-type: none"> Disclosed to OLG through the Workday COI Buddy App and reviewed to ensure it is appropriate ELT members, CEO & President and Board Members can use discretion without prior approval however they must disclose the gift for tracking and recordkeeping Consult with Ethics & Compliance Program Office and Legal Services, as needed
<p>Nominal Gifts</p>  <p>ALLOWABLE</p>	<p>Gift may only be accepted if it is not otherwise a Prohibited Gift, AND the value is less than \$50 after considering the factors on page 4.</p> <p>The \$50 value is not per gift but rather the cumulative value of gifts received by the OLGer annually from the same source.</p> <p>Nominal gifts include attendance at training events offered for free or at a substantial discount by third parties. This is allowable if (a) its normal course of business and consistent with talent development goals of the organization or individual or (b) within expected contractual scope of work with an existing vendor so long as reasonable and predominantly oriented towards training and education.</p>	<p>No disclosure or pre-approval requirements</p>

How to Decide.....



The overarching principle when deciding whether to accept a gift is whether it could reasonably influence or appear to influence the OLGers judgment or the performance of their duties to OLG.

*If accepting a gift will create a conflict of interest, then OLGers **MUST** not accept the gift. These gifts are strictly prohibited. For example, if accepting a gift would influence a business decision this is a conflict of interest.*

1

Step 1: Is the gift prohibited because it creates an actual or perceived conflict of interest? Don't Accept! If not, proceed to step 2 to determine if the gift is considered nominal or discretionary in nature.

2

Step 2: Is gift of nominal value (less than \$50.00) and not a prohibited gift? You may accept. Be careful though because even **nominal gifts** if accepted frequently can present the perception of conflict of interest. If not, proceed to step 3 because the gift would be discretionary in nature.

3

Step 3: If the gift is not prohibited or of nominal value, it might be possible to accept the gift with pre-approval from your People Leader and Divisional Leader. This would be a discretionary gift.

You should consider the following factors:



Value: May the gift be viewed as lavish or not part of usual business activity



Context & Circumstances: How did you come to receive or offered the gift and would it be viewed as usual business practice



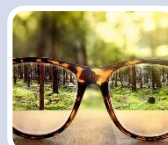
Exclusivity: Is the gift offered exclusively to an individual OLGer or to persons in other entities,



Obligation: Whether the gift creates an obligation for the employee or OLG



Influential: The gift would cause you to make a decision during your OLG duties that you would not otherwise make (or appear to influence)



Public Perception: Will the gift embarrass OLG or employee if made public (i.e. the Gift is outside the normal course of business)



Frequency of Gifts from the same source.

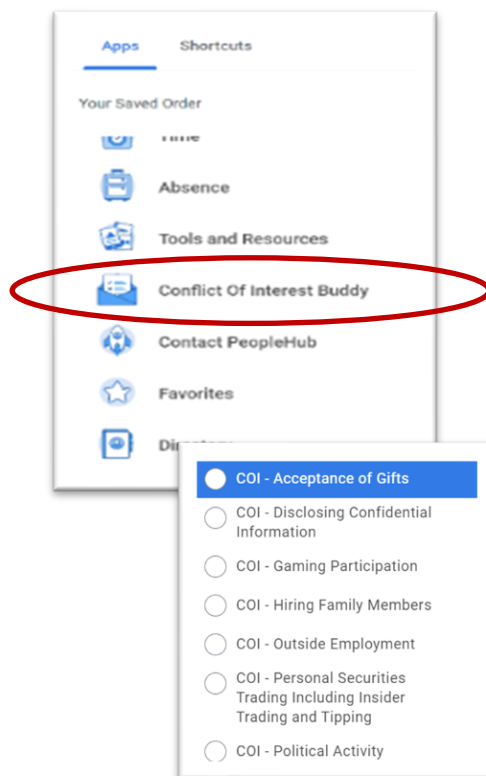
How to Make a Gift Disclosure

A gift requires disclosure through OLG's [Conflict Of Interest Buddy in Workday](#) for **prohibited gifts** that are received and **discretionary gifts** which must be pre-approved.

Divisional Heads and People Leaders must review and approve Gift Disclosures submitted by OLGers.

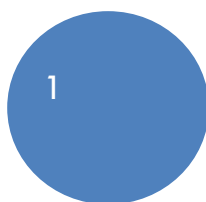


Remember that when seeking approval to accept a discretionary gift, you must make it clear with a detailed rationale why you think accepting the gift would not create a real or perceived conflict of interest. This is very important.



THE DISCLOSURE PROCESS

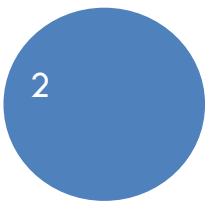
Access the Form



Open the COI Buddy in Workday.

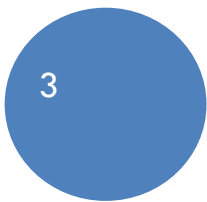
Note: Board Members do not disclose through Workday.

Complete & Submit Form



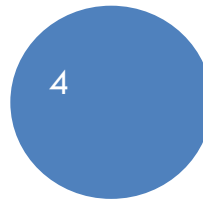
Complete the questionnaire form using the dropdown lists, including details and rationale for the offered gift and submit.

Report Review Process



Gift disclosure is reviewed and approved, as applicable, by the People Leader and Divisional Head.

Employee Notification



The designated approver notifies the employee of the result of the Gift disclosure.



APPROVED



DENIED

Appendix A

Scenarios at a Glance

The scenarios are not exhaustive. This is guidance only.

OLGers, People Leaders and Divisional Heads must use care and caution when deciding whether to accept a gift to ensure no conflicts exist in order to follow the spirit of the *Public Service of Ontario Act*, OLG's *Code of Business Conduct and Conflict of Interest Rules*.

If you have questions or come across a different scenario speak with your People Leader and/or contact the Ethics & Compliance Program Office (#ECPO).

Nominal Gifts

Overarching Principle: Nominal gifts can be accepted if they don't create an actual or perceived conflict of interest (i.e. this would constitute a Prohibited Gift) and are below the \$50.00 threshold.

Item or benefit to an OLGer or Board Member	Can it be accepted	Guidance	Do you have to disclose
Tangible gifts such as books, mugs, pens, notepads, or calendars	Yes	Typically, the value is nominal (less than \$50.00).	No
Pins, tote bags, hats, t-shirts, or other promotional items from OLG social awareness campaign partner event (i.e. Pride)	Yes	Typically, the value is nominal (less than \$50.00).	No
Acknowledgement gifts such as personalized plaques, trophies in honour of an OLGer. For example, a thank you gift for speaking at an event	Yes	Typically, the value is nominal (less than \$50.00).	No
A third party company doing business with OLG offers OLGers the opportunity to buy tickets to a sporting event at market (face) value. The tickets would be purchased out of the OLGers pocket and offered to the public for purchase at the same time.	Yes	There is no discount on the tickets and the opportunity to purchase tickets is available to the public at the same time as the offer is made to the OLGer. As such, there is no benefit received by the OLGer that is not also available to individuals outside the organization. If the vendor/third party company offers to pay for the entrance for the industry conference it must be treated as discretionary and subject to review and approval to ensure a conflict of interest does not exist.	No
OLGers attend a lunch and learn educational seminar hosted by a vendor for professional development with individuals from other entities. The OLGer receives free entry into the educational event.	Yes	Nominal Gifts generally include invitations to attend educational seminars or events that are consistent with usual business practice, an OLGers role to promote professional development and non-exclusive to OLGers or contemplated in a negotiated statement of work with the vendor. Food & beverage is normally light refreshments in these circumstances and nominal in value.	No
Food and beverages provided at no charge to OLGers at trade events or business functions such as conferences and educational seminars.	Yes	Nominal Gifts generally include food & beverage at educational seminars or events as they are typically of nominal value and included as part of the conference registration fee. More expensive meals greater than \$50.00 sponsored by vendors should be viewed as a discretionary gift with pre-approval and carefully considered prior to attendance.	No
OLGer is invited to speak at an industry conference or educational event with the registration fee waived.	Yes	It is usual business practice for speakers to receive free entry to events.	No
Offer from an entity to provide an industry expert from their organization to address a group of OLGers, free of charge.	Yes	The cost of obtaining an expert to speak is likely to cost more than \$50.00 and offered exclusively to OLGers. However, this may be acceptable if consistent with usual business practice, talent development goals of the Division or Department and a reasonable person would not believe that OLGers could be influenced related to future procurement	No

		decisions. Typically, this would be considered usual business as the event doesn't generally target a single OLGer thereby reducing the risk that their decisions are influenced in a way that is detrimental to OLG.	
OLGer is invited to attend an event that OLG sponsors. The event ticket exceeds \$50.00 but the fee is waived as OLG sponsors the event.	Yes	OLGer may accept the invitation if the sponsorship agreement provisions that OLG is entitled to event tickets as part of the agreement. In this case, OLG is essentially paying for the tickets as part of the sponsorship or alternative agreement with the third party. Ticket banks in this case can be offered to OLGers at the discretion of Divisional Heads as they would not represent a "gift".	No

Discretionary Gifts

Overarching Principle: A discretionary gift should not be accepted if it creates an actual or perceived conflict of interest as this would constitute a prohibited gift! The factors on page 4 should be considered carefully before accepting the gift.

USE CAUTION!!

Item or benefit to an OLGer or Board Member	Can it be accepted	Guidance	Do you have to disclose
Receipt of a gift as a token of appreciation for attending a cultural event. For example, an OLGer attends an Indigenous Pow Wow. As a token of appreciation, the OLGer receives a painting valued at \$250 for attending the event.	Possible	The giving of gifts is common when dealing with certain cultures (i.e. Indigenous) and it may not be appropriate to reject the gift. An OLGer may accept a cultural gift if there is no commercial business relationship and is not a prohibited gift item (e.g. lottery tickets). For example, in this scenario perhaps the painting could be displayed in OLG Corporate Offices for the viewing of all OLGers. Pre-approval may not practical as the OLGer is not expecting the gift however it must be disclosed after-the-fact.	Yes – OLGer must disclose upon receipt of the gift as under different circumstances, appreciation gifts that are not given for cultural events as a gift giving norms may be considered prohibited or discretionary.
A family member or individual with a close personal relationship AND a business relationship with OLG offers a gift to an OLGer that would otherwise constitute a Prohibited Gift.	Possible	An employee may accept a gift that would otherwise constitute a Prohibited Gift if there is a family or close personal relationship with the giver such that the exchange of gifts has been an ordinary custom between the parties and the employee or Board Member discloses the gift. Must disclose upon receipt of the gift as in normal circumstances without a personal relationship the gift could be deemed prohibited or discretionary due to the individual's business relationship with OLG.	OLGer must disclose as a discretionary gift if the value is > \$50.00. Must disclose and receive approval from Divisional Head to accept
Sympathy flowers received from a vendor or business partner to acknowledge the death of a family member.	Possible	Flowers typically exceed the nominal value however pre-approval is not practical as the OLGer is not expecting the gift and it is not practical to return the gift.	If the value is greater than \$50.00 the sympathy flowers may be considered a Prohibited Gift and must be disclosed however it would not be practical to obtain pre-approval or return the flowers.

Gift card valued at more than \$50, which can't be converted to cash , received from an entity offered as token of appreciation (includes eGift Cards)	Possible	Possible to accept if the gift card if it can't be converted to cash and is not considered a Prohibited Gift. Typically, accepting cash is not viewed as a normal business practice for many organizations and industries which is why it is prohibited at OLG.	OLGer must disclose as a discretionary gift if the value is > \$50.00. Must disclose and receive approval from Divisional Head to accept
Digital items like the gift of a subscription of music, podcasts, e-books (Spotify, online newspaper, etc.).	Possible	Possible to accept if the gift can't be converted to cash, is less than \$50.00 and is not considered a Prohibited Gift.	Yes – OLGer must disclose as a discretionary gift and receive approval from Divisional Head to accept
Another entity offers shareable items such as cookies, cupcake in the form of a gift basket as a token of appreciation.	Possible	Typically, a gift basket would exceed the \$50.00 nominal threshold. As a best practice, these items should be shared across multiple OLGers in a team, department, or Division to reduce the risk of a perceived conflict of interest.	Yes – OLGer must disclose as a discretionary gift and receive approval from Divisional Head to accept. In cases, OLGers may not be aware that a gift basket is being sent so pre-approval is not practical however the gift should be disclosed.
<p>Occasional invitations from an existing business partner to lunch or dinner to discuss business provided they qualify as “an expression of courtesy or hospitality”.</p> <p>For example, an offer or invitation for an OLG team to attend lunch with project representatives from a vendor that is working on a project with OLGers.</p>	Possible	<p>Meal offers may exceed the nominal gift limit of \$50.00 and frequent offers may be perceived to influence the OLGers decision making.</p> <p>In occasional circumstances it may be reasonable to accept hospitality provided acceptance of the meal would not be viewed by a reasonable person as an actual or perceived conflict of interest. This may be consistent with a common business practice as attendance may contribute to more effective working relationships and the offer is dispersed across several individuals. The intent is to recognize that while it may be appropriate to accept offers of hospitality to advance commercial business needs it should not be regular or seen as business as usual at OLG given the sensitivity.</p> <p>To avoid any potential conflicts of interest it is usually advisable to conduct business discussions during regular working hours at OLG offices or encourage OLGers to pay for their own meals and seek reimbursement under OLG's travel, meal & hospitality policy.</p> <p>No new business should be discussed that would otherwise be subject to a competitive procurement.</p> <p>As a best practice, the Senior Leader responsible for vendor/account management should carefully weigh the business value of the hospitality with the possible perceived conflict of interest using the seven factors on page 4.</p>	Yes – OLGer must disclose as a discretionary gift and receive approval from Divisional Head to accept

<p>OLGers along with representatives from other provincial lottery jurisdictions, Regulators and vendors are invited to a more expensive dinner valued at more than \$50.00 while attending an industry conference.</p> <p>The dinner is sponsored by a vendor doing business with OLG and attendees do not have to pay for the dinner.</p>	Possible	<p>The dinner typically exceeds the nominal value threshold.</p> <p>Attending a dinner at a conference may be viewed as usual business practice. It may be possible to accept the dinner with pre-approval as the invite extends beyond OLG to individuals of other entities (not exclusive to OLG) and current/future business is not discussed with vendors (no lobbying).</p> <p>OLGers must be cautious and very careful because of the optics related to vendor sponsored dinners at an industry conference despite the factors described above. In occasional circumstances it may be reasonable to accept hospitality provided acceptance of the meal would not be viewed by a reasonable person as an actual or perceived conflict of interest. The intent is to recognize that while it may be appropriate to accept offers of hospitality, in this case a dinner at an industry conference attended by other non-OLG attendees, accepting hospitality should not be regular or seen as business as usual given the sensitivity. The occasional instances must be disclosed, tracked, and reported for transparency purposes.</p>	<p>Yes – OLGer must disclose as a discretionary gift and receive approval from Divisional Head to accept</p>
<p>An OLG Department is planning a team event and would like to purchase event tickets at a discounted rate through an existing vendor partnership.</p> <p>For example, purchase discounted tickets to watch the Toronto Blue Jays by leveraging OLG's relationship with Maple Leaf Sports and Entertainment.</p>	Possible	<p>The value of the ticket discount should be considered along with the estimated value of the event to build team cohesion to support OLG's winning culture and playing as one team truths.</p> <p>A practical alternative is to speak with OLG's People & Culture team to incorporate the vendor discount into OLG's Corporate Discount Program for all or many employees.</p>	<p>Yes – OLGer must disclose as a discretionary gift and receive approval from Divisional Head to accept</p>
<p>An OLGer is engaged in conversations with another entity about a single-entity strategic business deal that is not a competitive procurement.</p> <p>The entity invites an OLGer to a lunch/dinner or entertainment event that is meant to build a relationship and discuss the business development deal.</p> <p>The offer would otherwise be considered reasonable commercial business activity.</p> <p>A single-entity business deal means the business development opportunity is exclusive to one entity as the potential business partner rather than a competitive procurement because the entity provides a unique or bespoke value proposition for OLG to advance commercial business activities.</p>	Possible	<p>Reasonable levels of business hospitality are useful practices in the competitive commercial environment in which OLG operates. These practices can contribute to developing good business relationships and advancing business development initiatives.</p> <p>In normal circumstances, OLGers should make their best efforts to discuss business with third parties during regular business hours and in business settings. Nevertheless, representatives of external organizations may invite individuals to events and/or meals, most commonly to lunch either preceding, following or during business discussions or other business interactions.</p> <p>In occasional circumstances it may be reasonable to accept hospitality or entertainment offers provided that the "deal" is a single-entity deal (i.e. not part of a competitive procurement process) and prior approval is received. The intent is to recognize that while it may be appropriate to accept offers of hospitality or entertainment to advance commercial business needs it should not be regular or seen as business as usual given the sensitivity. The occasional instances must be disclosed, tracked, and reported for transparency purposes.</p>	<p>Yes – OLGer must disclose as a discretionary gift and receive approval from Divisional Head to accept</p>

Prohibited Gifts

Overarching Principle: A Prohibited Gift creates an actual or perceived conflict of interest and should not be accepted under ANY circumstances.

DON'T ACCEPT!!!

Offer to provide lottery tickets as a token of appreciation.	No	OLGers are prohibited from purchasing lottery products and participating in gaming activity under OLG's Code of Business Conduct	Yes – Cannot accept and OLGer must disclose as a prohibited gift if accepted in error
A loan, other than on normal commercial terms provided by an entity in the business of lending.	No	Prohibited as this gift leads to personal gain for the OLGer and creates an obligation that could influence future business decisions.	Yes – Cannot accept and OLGer must disclose as a prohibited gift if accepted in error
Offer of a charity donation in OLG's name as a token of appreciation for the business partnership. The vendor offers to mail the cheque to OLG to make the charitable donation.	No	A practical alternative is to suggest that the vendor makes the charitable contribution in their own name rather than OLG's OR mail the cheque directly to the charitable organization so that OLG does not receive the donation or take possession of the funds.	Yes – Cannot accept and OLGer must disclose as a prohibited gift if accepted in error
Offer to provide valuable tangible goods and consumables that exceed the nominal value and/or are not consistent with usual business practices at OLG, including cash and alcohol-based products.	No	These tangible goods are typically valued at more than \$50.00 and could be perceived to influence future business decisions. Acceptance of alcohol-based products is not typically viewed as usual business practice at OLG. Typically, accepting cash is not viewed as a normal business practice for many organizations and industries which is why it is prohibited at OLG.	Yes – Cannot accept and OLGer must disclose as a prohibited gift if accepted in error
Offer of free entry into a draw for a chance to win or purchase event tickets. The opportunity for the same tickets is not available to the general public.	No	While the offer to enter the draw is free (no value), the prize is typically valued at more than \$50.00 and results in personal gain for the OLGer as the offer is not available to the general public.	Yes – Cannot accept and OLGer must disclose as a prohibited gift if accepted in error
A vendor offers a gift to an OLG procurement representative or member of a procurement evaluation team during a competitive procurement such as RFI, RFPQ, RFP, RFS, etc.	No	OLGers cannot accept gifts from an entity when they are directly or indirectly involved in an active/ongoing competitive procurement for goods or services. This could be perceived as favoritism for a specific proponent and unfair to other vendors.	Yes – Cannot accept and OLGer must disclose as a prohibited gift if accepted in error
A vendor offers a gift to an OLGer engaged in an active contract negotiation with the vendor (either a new or existing vendor).	No	If gift offers are made while a contractual agreement is under active consideration for renewal or negotiation, the gift must be refused as this could be perceived to influence the OLGers decision allowing more favorable contract terms for the vendor.	Yes – Cannot accept and OLGer must disclose as a prohibited gift if accepted in error

<p>Tickets to a major sporting event or invitations to participate in a charity event such as a golf tournament valued at greater than \$50 but paid for by another entity with no business purpose or attendance by the entity representative hosting/organizing the event.</p> <p>Attendance at the event is not being used to advance OLG's commercial business goals.</p>	<p>No</p>	<p>It is not typical or customary for OLG to accept entertainment tickets to events, concerts, sporting events, etc.</p> <p>Tickets or invitations to sports events, concerts, charitable events, or invitations to trade and industry-sponsored sports events, such as golf, tennis, or curling, will not normally qualify as Nominal Gifts as they typically exceed the \$50 limit. The cost associated with these events is often substantial. A practical alternative is for the OLGer to pay for their own ticket.</p> <p>This scenario does not include non-competitive business development initiatives which is covered under another a "discretionary" scenario in this Gift Guide. In a non-competitive business development scenario, a vendor representative(s) attends an event with OLG representative(s) to discuss a strategic/bespoke business deal that involves only a single vendor.</p> <p>This prohibited gift scenario would be a straight up gift offer of an event ticket to an OLGer without any real legitimate business purpose. For example, OLGer attends the Gaming Conference and a Service Provider offers to pay the entry into a Golf Tournament. Another example might be where a vendor offers an OLGer two tickets to an event to take their spouse and the vendor representative doesn't attend. In these cases, the offer should be declined and the OLGer pay for their own ticket/entry as there is no legitimate business purpose for acceptance of the entertainment gift.</p> <p>This is different than a discretionary scenario in which an OLGer attends an event with a vendor representative to discuss a business deal and advance OLG's commercial interests.</p>	<p>Yes – Cannot accept and OLGer must disclose as a prohibited gift if accepted in error</p>
<p>Travel or accommodations such as airline tickets, lodging, vacations, spa, etc. paid for by third party service providers and/or vendors.</p>	<p>No</p>	<p>Travel and accommodations typically exceed the nominal gift limit of \$50.00. The cost associated with these gifts is often substantial and typically acceptance of such offers would not be viewed as usual business practice at OLG.</p>	<p>Yes – Cannot accept and OLGer must disclose as a prohibited gift if accepted in error</p>

Standards Owner

Michael Petrocco, VP Compliance & Investigations

Standards Approval

Approver	Date
Michael Petrocco, VP Compliance & Investigations	March 19, 2024
Tony Wong, SVP Governance, Legal & Compliance	February 22, 2024

Revision / Review History

Revision / Review Date	Updated By	Summary of Revision / Review
March 19, 2024	Ethics & Compliance Program Office	New Standards to supersede existing Acceptance of Gifts policy in accordance with Policy on Policies.