

Gift and Entertainment Guidelines



Guidelines:

Gifts and Entertainment	*USD Value or Equivalent Per gift/per person Maximum 4 times in a 12-month period
All other countries, except Philippines, Malaysia, Thailand, and India	Up to \$250
In Philippines, Malaysia, Thailand, and India	Up to \$50
Government officials and Healthcare Professionals	\$0 - unless advanced written approval obtained from the Ethics and Compliance team.
Cash, cash equivalent gifts or gifts that can be redeemed for cash (gift cards, pre-paid cards, debit cards, checks, stock, lottery ticket, etc.). This does not include gifts between employees.	Never allowed

Definitions:

- **Gifts** - Items that may be considered gifts include both physical and nonphysical items of economic value and reimbursement of expenses.
- **Entertainment** - Items that may be considered "business entertainment" include meals, drinks, sporting or theatrical events, travel, accommodations, and similar items.
- **Government officials** include officers and employees of all ranks, no matter how high or low, of any government, any department or agency of a government, any public international organization, or any person acting in an official capacity on behalf of any government. Government officials include those acting on behalf of any entity that is owned or controlled by the government or state, political parties, party officials, and candidates for public office and public international organizations.
- **Healthcare Professionals** include any person in a position to prescribe, order, or purchase or influence the prescribing, ordering, or purchasing of a device, or any person or entity who may provide healthcare services or is connected with the provision of healthcare services, except salaried employees of ADI or a member of ADI's Board of Directors.

General:

Employees may not give or receive gifts or entertainment to or from current or potential vendors, suppliers, customers or other business partners unless all of the conditions below are met. These conditions apply everywhere in the world, even where different practices may be considered the "normal way of doing business":

- **Value.** The value of the gift or entertainment is reasonable and does not exceed the pre-approved value set in these guidelines.
- **Purpose.** The purpose of the gift or entertainment is not to obtain special or favored treatment, or not to influence, or even appear to influence, our business decisions or judgment. Do not engage in exchanging gifts or entertainment that may be perceived as a return, or kickback, directly to an employee for services carried during a business relationship.

- **Legal.** Giving or accepting the gift or entertainment is appropriate to the business relationship and permitted by applicable laws, rules and customs in both your country and the country of the recipient.
- **Conduct and agreements.** Does not violate the standards of conduct of the recipient's organization or any contractual agreement with a business partner.
- **Documented.** Gifts and entertainment must be properly documented, and, where necessary, proper approval must be obtained prior exchanging gifts and entertainment.
- **Compliance with policy.** Must be otherwise permitted under ADI's policies, including the Anti-Corruption Policy and [Travel and Entertainment Policy](#).

Key Exceptions:

- **Business Meals.** Meals paid for by ADI must be in accordance with ADI's [Travel and Entertainment Policy](#).
- **Business-related event attendance.** Tickets for sporting events and other forms of entertainment where participation is directly related to an employee's job function and part of legitimate ADI business are not considered a gift under ADI's policy. If you are unsure if attendance at an event is directly related to your role, check with your manager. For high-value or high-profile events, you should review your attendance with your manager and your vice president. Employees should never use relationships built through ADI business for their personal advantage, such as obtaining tickets that are difficult to access, since that is preferential treatment and could be considered a conflict of interest.
- **Conferences.** Free tickets to conferences that are offered by a vendor, supplier or other third party are permissible if the tickets are free to all attendees, offered as part of a contract with ADI, or offered to all customers of a particular vendor. Tickets outside of those parameters do not fall under an exception and require approval if the value is over the gift limit. Conference tickets purchased by ADI are not considered a gift under ADI's policy.

Refusing and Returning Gifts:

Gifts outside the value limits should be declined or returned whenever possible. If it is impossible or inappropriate to refuse or return a gift, you should notify your manager immediately after accepting the gift, then report the gift to Ethics and Compliance team for further guidance. Perishable, non-alcohol gifts may be placed in a common area for employees to share.

Gifts, Travel, Meals and Entertainment for Government Officials:

Generally, gifts, travel, meals or entertainment to government officials is prohibited. If you are considering giving gifts, travel, meals or entertainment to someone who works for or who is affiliated with a government or government official – either directly or through an agent, contractor, or other third party acting on ADI's behalf – then you need to obtain an advanced written approval from the Ethics and Compliance team.