



# **GIFTS & ENTERTAINMENT POLICY**

**Revised May 2026**

**Revisions**

May 2026	Endorsed by Full Board Q2 2026 Full Board Meeting (23.05.2026)	Updated following the TI re-accreditation review
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## 1. Purpose

The purpose of this policy is to establish clear standards for the acceptance and offering of gifts, hospitality, entertainment benefits, or any item of value in connection with the work of Transparency International Papua New Guinea (TIPNG).

The aim of this policy is to:

- Safeguard TIPNG's independence, integrity, and credibility.
- Prevent any potential undue influence, bribery, or conflict of interest.
- Ensure that any gifts or benefits are appropriate, transparent, and aligned with TIPNG's vision and mission.
- Protect TIPNG from reputational, legal, and ethical risks arising from improper exchanges.
- Provide clear guidance to external stakeholders engaging with TIPNG.

## 2. Scope

2.1. The policy sets out the standards that must be observed by:

- TIPNG Board Members
- Leadership Team
- Employees
- Interns
- Volunteers

It covers both the offering and acceptance of gifts, hospitality, entertainment benefits, and any other items of value from a third party.

All persons covered under this Policy are required to exercise sound judgment when dealing with gifts and benefits, ensuring that no action compromises TIPNG's brand or reputation.

2.2. This Policy must be read together with:

- TIPNG's Code of Conduct
- Conflict of Interest Policy
- Whistleblower Policy
- Financial Manual

## 3. Definitions

3.1. For the purpose of this policy:

- a. *"Gift"* means any item of value provided without payment, including but not limited to:
  - Cash or cash equivalents (strictly prohibited)
  - Vouchers, gift cards
  - Corporate merchandise

- Hamper, food baskets
  - Tickets to events
  - Discounts not available to the public
  - Loans or favourable terms
  - Travel or accommodation
  - Sponsored conference attendance
  - Corporate gifts of nominal value (e.g., branded merchandise) may be acceptable if within the approved threshold.
  - Festive gifts (e.g., Christmas hampers) are also classified as Gifts.
  - Cultural artifacts or traditional items
- b. *“Entertainment”* or *“Hospitality”* means invitation or participation in any social/leisure activity without payment including but not limited to:
- Meals
  - Coffee meetings
  - Cocktails
  - Receptions
  - Event invitations
  - Conference hosting
  - Sporting events
  - Cultural events
- bb. Entertainment may be acceptable where:
- It is reasonable and proportionate
  - It is clearly related to legitimate TIPNG business
  - It is not excessive or frequent
  - It cannot reasonably be perceived as influencing decision-making.
- c. *“Informal Catch-ups”* with stakeholders such as coffee meetings are considered hospitality, but they do NOT require formal declaration if:
- Value is modest (e.g., standard coffee)
  - Occurs in normal course of work.
  - No procurement, funding or decision is pending.
  - Not repeated excessively.
  - If a stakeholder regularly pays, or the setting is upscale/luxury, it must be declared.

Rule of thumb: *Would you be comfortable if this appeared on the front page of the daily newspaper?*

#### **4. Policy Statements**

##### **4.1 Prohibited Gifts**

The following are strictly prohibited:

- Cash gifts or cash equivalents
- Gifts intended to influence TIPNG decisions
- Gifts from parties bidding for contracts
- Gifts during active procurement or funding negotiations
- Gifts that create actual or perceived conflicts of interest
- Gifts from political parties, politicians & politically exposed or associated persons.

#### 4.2 Acceptable Gifts (Threshold System)

TIPNG may adopt a reasonable PNG-appropriate threshold:

- Proposed Threshold: K300
- Gifts with a collective value at K300 or below → Must be declared and recorded in the Gift Register.
- Gifts with a collective value above K300 → Must receive CEO approval (or Board Chair if CEO is recipient).
- If inappropriate → Must be declined and recorded.

Threshold can be adjusted by Board resolution.

#### 4.3 Rejected Gifts

All gifts that are declined or returned must be formally recorded in the Gift Register. The record should include, at a minimum:

- The Description of the Gift
- Name of Giver & Organisation
- Estimated value
- Reason for rejection
- How it was handled (returned/donated/shared)

#### 4.4 Shared Gifts or Perishable Gifts

Where a gift cannot reasonably be declined or returned (for example, perishable items or gift hampers), the following options may be considered:

- Share among staff
- Donate to charity
- Auction internally with funds going to TIPNG
- Must still be declared.

#### 4.5 Offering Gifts

Where TIPNG offers gifts, the following principles shall apply:

- Must be modest, reasonable and appropriate for the occasion
- Collective value of item(s) should not exceed K300 per recipient
- Gifts offered to Government officials require CEO approval

- Outgoing gifts must be recorded in the Gift Register

## **5. Gift Declaration (Mandatory)**

### **5.1. Gift Declaration Form**

All gifts, hospitality, and entertainment benefits—whether received, offered, declined, or returned, must be formally disclosed through the “Gift Declaration Form”.

The relevant TIPNG representative must complete and submit this form to the Administrative Officer within two (2) business days of the occurrence. The Administrative Officer is responsible for recording all disclosures in the TIPNG Central Gift Register.

### **5.2. Gift Register**

a. TIPNG shall maintain a Central Gift Register, administered by the Administrative Officer. The Register must capture the following information:

- Date
- Name of Recipient (TIPNG staff/Board)
- Position
- Name of Giver
- Organisation
- Description of Gift / Hospitality
- Type (Gift / Entertainment / Rejected)
- Venue / Location (for hospitality)
- Estimated Value (K)
- Purpose of Event
- Procurement / Funding Relationship? (Yes/No)

b. Upon completion, the outcome of the gift must be recorded, including:

- The decision taken (accept/declined/share/donate)
- Comments/supporting documents (if necessary)
- Recipient Signature
- Witness Signature
- CEO / Board Approval (if required)

c. The Register should be:

- Reviewed quarterly by CEO
- Reported annually to Management Sub-Committee

## **6. Cultural Sensitivity**

TIPNG respects Papua New Guinean custom of gift giving and culture of appreciation or hospitality. If refusing a gift would cause cultural offense, you may accept it on behalf of the organization in accordance clause 4.4 of this policy.

In such instances, the gift must be promptly declared and handled in line with established procedures under clause 5 of this Policy.

All decisions relating to gifts declaration must be guided by the following principles:

- Transparency over secrecy
- Perception matters as much as intent
- When in doubt — declare
- Integrity over relationship preservation
- Public interest above personal comfort

## **7. Monitoring and Compliance**

TIPNG will ensure ongoing compliance with this Policy through:

- **Annual Declaration:** All staff are required to certify, on an annual basis, their understanding of and compliance with the Gifts and Entertainment Policy.
- **Internal Awareness:** TIPNG shall put in place mechanisms to reinforce staff understanding of this Policy, through toolbox sessions, consistent reminders through staff meetings, email, etc. TIPNG is to ensure staff can promptly identify and address emerging risks.
- **Internal Review:** This Policy shall be subject to review as and when required, to ensure its continued relevance, effectiveness, and alignment with organisational needs.

# ANNEX 1: REGISTER OF GIFTS DECLARATION FORM



**TRANSPARENCY INTERNATIONAL INC.**

## REGISTER OF GIFTS AND HOSPITALITY DECLARATION FORM

Description of gifts	Number/ Quantity Description	Date of gift:	Estimated value:	Organization/Person offering the gifts:	Relationship of Organization/person with TIPNG:
<b>Total</b>					<b>0</b>

Confirmation of Receipt for and on behalf of TIPNG

*I confirm I received the above items as gifts and have advised the management of TIPNG, accordingly.*

Name: \_\_\_\_\_  
Date: \_\_\_\_\_

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