



Heritage Sign & Display, Inc.
344 Industrial Road
Nesquehoning, PA 18240

phone 570.645.8701
fax 570.645.2178
www.popsigns.com
heritage@popsigns.com

Gifts and Entertainment Policy March 1, 2018

Fair dealing, consideration for the rights and feelings of others, and the highest standards of corporate citizenship shall be the foundation of all business conduct.

Heritage Sign and Display, Inc. (HSD) requires and expects that each employee and supplier conduct their business affairs in a manner that does not cloud their judgment when dealing with each other or making decisions on behalf of HSD and its Clients.

Business transactions must be undertaken solely in the best interests of HSD and its Clients.

1. Acceptance of Payments, Loans, Entertainment, and Gifts by Company Employees

No Company employee may seek or accept any payment, loan (other than on prevailing terms from financial institutions), service, gratuity, gift (except as indicated below), personal travel, or other favor of more than nominal value from any individual or organization doing or seeking to do business with HSD. Gratuities include any material goods or services offered with the intent of, or providing for, influencing a buying decision. It is essential to avoid any activity that may diminish, or even appear to diminish, the objectivity of the buying decision. Gratuities include cash, credits, discounts, supplier contests, sales promotional items, product test samples, seasonal and personal gifts, edibles, drinks, household appliances and furnishings, clothing, loans of goods or money, tickets to sporting events, dinners, parties, transportation, vacations, cabins, travel, hotel expenses, and various forms of entertainment.

In addition, Company employees should not accept entertainment from third parties beyond ordinary and reasonable social amenities (discussed below). Employees should inform all persons doing or desiring to do business with HSD, that HSD does not allow gifts to employees or to employees' family members. If a gift is made in cash, it must be returned at once. In the case of a non-cash gift, it may be retained only if it is of nominal value, associated with candy, cigarettes, beverages, or food products for personal consumption, flowers, and souvenirs, and the employee's immediate supervisor must be advised of the occurrence. All other gifts must be returned at once. Under no circumstances is a gift to be sent to an employee's home.

- a. Entertainment is defined as a non-cash gift, which an employee may accept from a third party who is doing business with HSD only if such entertainment is limited to ordinary and reasonable social amenities. If such entertainment exceeds \$100.00 in retail value, it must be refused.
- b. Travel and lodging are not included in the limited exceptions granted for "Entertainment" and "Gifts" and, unless unascertainable (e.g., corporate guesthouse), are prohibited in all circumstances.

2. Business Meals

Occasionally, during the course of business, it may be appropriate to conduct business during meals.

- a. Such meals must be for a specific purpose.
- b. Frequency with the same supplier must be avoided.
- c. The employee must be in a position to pay for meals as frequently as the third party.
- d. Approved by the appropriate supervisor prior to occurrence.

3. Supervisor Approval

- a. Any "Entertainment" or "Gift" must be directed to a department supervisor or manager. No gifts are to
- b. be offered or accepted by any other individuals. Any "Entertainment" or "Gift" must have prior approval by the appropriate HSD supervisor or manager.

I have read and understand the Gifts and Entertainment Policy and have watched the training videos as required.

Name

Date