

## GIFT ACCEPTANCE POLICY

As part of its conflict of interest policy, NEDA requires that directors, officers, advisors and employees decline to accept certain gifts, consideration or remuneration from individuals or companies that seek to do business with NEDA or are a competitor of it. This policy and disclosure form is intended to implement that prohibition on gifts

**Section 1.** “Responsible Person” is any person serving as an officer, employee, advisor, or a member of the board of directors of NEDA.

**Section 2.** “Family Member” is a spouse, domestic partner, parent, child or spouse of a child, or a brother, sister, or spouse of a brother or sister, of a Responsible Person.

**Section 3.** “Contract or Transaction” is any agreement or relationship involving the sale or purchase of goods, services or rights of any kind, receipt of a loan or grant, or the establishment of any other pecuniary relationship. The making of a gift to NEDA is not a “contract” or “transaction.” This gift policy is not intended to preclude the receipt by an organization connected to a Responsible Person of a research grant from NEDA, provided that related actual or potential conflicts of interest have been addressed as contemplated elsewhere in the Conflicts of Interest Policy.

**Section 4.** Prohibited gifts, gratuities and entertainment. Except as approved by the Chair of the Board or her/his designee or for gifts of a value less than \$50 which could not be refused without discourtesy, no Responsible Person or Family Member shall accept gifts, entertainment or other favors from any person or entity which:

1. Does or seeks to do business with NEDA or,
2. Does or seeks to compete with NEDA or,
3. Has received, is receiving, or is seeking to receive a Contract or Transaction with NEDA.