

# Holiday Reminder on Gifts and Entertainment

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## Holiday Greetings!

During this season of celebration, we're sending this brief reminder that gifts and entertainment can be done in a manner that preserves their intent and avoids the appearance of a conflict of interest.

Gifts – Giving small, personal gifts is often a part of local culture. An appropriate gift should be of nominal value, infrequent and not requested. It must never be in cash, or cash equivalent such as a gift card. No gift should be linked – or appear to be linked – to favors or decisions or entail any sense of obligation on the part of the giver or receiver.

Meals & Entertainment – On a modest scale, meals and entertainment are commonly used to build goodwill and strengthen working relationships among business associates. Providing or accepting occasional meals and tickets for sporting or cultural events may be appropriate in certain circumstances. However, if offers of meals, entertainment or travel are frequent or of substantial value, they may be seen by others as an inappropriate attempt to gain influence or receive special favors. Be aware of such perceptions and plan your events accordingly.

Conflicts can arise whether giving or accepting gifts, meals or entertainment. Accusation of double standards may arise if you give more generously than you are allowed to accept. Conversely, a sense of obligation or reciprocity may arise if you accept.

You need to be especially careful that gifts, meals or entertainment for Government officials and their agents are not seen as bribes, gratuities or facilitation payments under the Foreign Corrupt Practices Act (FCPA), the U.K. Bribery Act (UKBA) and local anti-corruption laws. Be careful to avoid both what is or what could be considered a bribe or an exchange of favors. Keep in mind that these laws apply to you, your families and your subcontractors.

Gifts, meals or entertainment costs are non-billable to the client and must be recorded appropriately in our accounting system. If you have any questions about appropriateness, please contact Mike Walsh in Bethesda at [Mike\\_Walsh@dai.com](mailto:Mike_Walsh@dai.com), Jeremy Finch in London at [Jeremy\\_Finch@dai.com](mailto:Jeremy_Finch@dai.com) or the ethics e-mail at [ethics@dai.com](mailto:ethics@dai.com). You can also submit an anonymous inquiry through the ethics hotline at 1-503-597-4328 or through the webpage at [www.dai.ethicspoint.com](http://www.dai.ethicspoint.com).

This message is being sent globally to supervisors, Team Leaders and Chiefs of Party from Jeremy Finch, Ethics and Compliance Officer for DAI/Europe and Mike Walsh, Chief Ethics and Compliance Officer. Please pass this message to your staff, colleagues, subcontractors and grantees.

Best wishes for 2020!

Mike Walsh & Jeremy Finch

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