Appendix

APPROVED BY

Order of Private institution RAIN

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REGULATIONS

on Exchange of Business Gifts and Tokens of Business Hospitality in Private Institution RAIN

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# General Provisions

* 1. Regulations on Exchange of Business Gifts and Tokens of Business Hospitality in Private Institution RAIN (hereinafter referred to as Regulations) are developed in accordance with the Federal Law dated 25.12.2008 No. 273-FZ “On Combating Corruption”, other regulatory legal acts of the Russian Federation, the Code of Ethics and official conduct of employees of Private institution RAIN and are based on generally accepted moral principles and norms of Russian society and the state.
  2. The Regulations shall define uniform requirements for all employees in Private institution RAIN (hereinafter referred to as employees, the Institution) for giving and accepting business gifts.
  3. The Institution shall maintain a corporate culture in which business gifts and tokens of business hospitality shall be considered by employees of the Institution only as a tool for establishing and maintaining business relationships and as a manifestation of international comity in the course of the Institution activities.
  4. The Institution assumes that long-term business relationships shall be based on trust and mutual respect in the Institution. Relationships that violate the law and the principles of business ethics harm the reputation of the Institution and the honor of its employees and cannot ensure sustainable long-term development of the Institution. This kind of relationships may not be acceptable in the practice of the Institution.
  5. The Regulations shall apply to all employees of the Institution, regardless of the level of their position.
  6. It is important, that employees representing the interests of the Institution or acting on its behalf, understand the limits of acceptable behavior in exchange of business gifts and extension of business hospitality.
  7. When using the terms describing hospitality, “business hospitality”, “corporate hospitality” in these Regulations – all provisions of these Regulations shall apply to them in the same way.

# Main Goals

2.1. These Regulations shall pursue the following goals:

providing a uniform understanding of the role and function of business gifts, business hospitality, representational events in the business practice of the Institution;

implementation of economic and income-generating activities of the Institution solely on the basis of appropriate standards and rules of business behavior based on the principles of competition protection, quality of work, services, and avoidance of a conflict of interest;

determination of uniform requirements for giving and accepting business gifts for all employees of the Institution, for organizing and participating in representative events;

minimizing the risks associated with possible abuse in the field of gifts, representative events. The most serious of these risks are the danger of tampering and bribery, injustice to contractors, protectionism within the Institution.

* 1. **Regulations on Exchange of Business Gifts and Tokens of Business Hospitality in Private Institution RAIN**
     1. Employees of the Institution may receive business gifts, tokens of business hospitality only at official events, if this does not contradict the requirements of the anti-corruption legislation of the Russian Federation, Autonomous District, these Regulations, and local regulatory acts of the Institution.
  2. Gifts and services accepted and provided by the Institution shall be transferred and accepted only on behalf of the Institution as a whole, and not as a gift or transfer from an individual employee of the Institution.
  3. In interaction with persons holding positions of state (municipal) service, one shall be guided by the norms regulating ethical norms and rules of official conduct of state (municipal) service employees.
  4. Business gifts to be donated and tokens of business hospitality that employees of the Institution on behalf of the Institution may transfer to other persons and organizations, or receive on behalf of the Institution and other persons and organizations in connection with their work activities, must simultaneously meet the following criteria:

be directly related to the statutory objectives of the Institution activities;

be reasonable, proportionate and not subject to luxury;

the value of the gift shall not exceed 3,000.00 rubles;

expenses shall be agreed with the President of the Institution;

not constitute a hidden reward for a service, action or inaction, connivance or patronage, granting of rights or taking certain decisions, or an attempt to influence the recipient with another illegal or unethical purpose;

not create obligations for the recipient, related to his official position or the performance of official (job) duties;

not create a reputational risk for the Institution, employees and other persons in case of disclosure of information on gifts made or representation expenses incurred;

not contradict the principles and requirements of the anti-corruption legislation of the Russian Federation, these Regulations, the anti-corruption policy of the Institution, the Code of Ethics and other local acts of the Institution and generally accepted standards of morality and ethics.

* 1. Business gifts, including in the form of service delivery, tokens of high esteem and participation in entertainment and similar events shall not put the receiving party in a dependent position, lead to any reciprocal obligations on the part of the recipient or affect the objectivity of his business judgments and decisions.
  2. To establish and maintain business relationships and as a manifestation of international comity, employees of the Institution may present representative gifts to third parties and receive them from them. Representative gifts shall mean souvenirs (including those with the logo of the Institution), flowers, confectionery and similar products.
  3. When receiving a business gift or tokens of business hospitality, an employee of the Institution shall be obliged to take measures to prevent the occurrence of a conflict of interest in accordance with the Conflict of Interest Regulation approved by the local regulatory act of the Institution.
  4. Rights and obligations of employees of the Institution in the exchange of business gifts and tokens of business hospitality.
     1. Employees representing the interests of the Institution or acting on its behalf shall understand the limits of acceptable behavior in the exchange of business gifts and tokens of business hospitality.
     2. Employees of the Institution shall have the right to give and receive business gifts from third parties, organize and participate in representative events, if it is legal, ethical and is done exclusively for business purposes as defined by these Regulations.
     3. The value and frequency of giving and receiving business gifts and/or participation in representative events of the same third party shall be determined by business need and be reasonable. Accepted business gifts and business hospitality shall not give rise to any reciprocal obligations on the part of the recipient and/or affect the objectivity of his business judgments and decisions.
     4. In case of any doubts about the legality or ethical nature of their actions, the employees of the Institution shall notify the Director of the Institution and consult with him before giving or receiving gifts or participating in certain representative events.
     5. Employees of the Institution shall not have the right to use their official position for personal purposes, such as the use of the property of the Institution, including:

for receiving gifts, reward and other benefits for themselves and other persons in exchange for the delivery of any services by the Institution, the implementation or non-implementation of certain actions, the transfer of information constituting a commercial secret;

for receiving gifts, reward and other benefits for themselves and other persons in the process of doing business of the Institution, including both before and after negotiations on the conclusion of civil law contracts and other transactions.

3.9.6. Employees of the Institution are not recommended to accept or transfer gifts or services in any form from third parties as gratitude for any service or advice given.

* + 1. It is not allowed to transfer and accept gifts from the Institution, its employees and representatives in the form of money, both cash and non-cash, regardless of currency, as well as in the form of shares, options or other liquid securities.
    2. Employees of the Institution must waive offers, gifts, payment for their expenses, etc., when such actions may influence or create an impression of the influence on the outcome of the transaction, the result of bidding, the decisions taken by the Institution, etc.
    3. Administration of the Institution does not accept corruption. Gifts shall not be used to give/take bribes or corruption in all its forms.
    4. As gifts, employees of the Institution shall strive to use souvenirs, objects and products that have symbols of the Institution in the maximum allowable number of cases.
    5. Gifts and services shall not put in question the image or business reputation of the Institution or its employee. Any employee of the Institution who received a business gift shall be obliged to inform the Director of the Institution about this.
    6. Any employee of the Institution shall not be entitled to offer to third parties or accept from them gifts, payments, compensation, etc., incompatible with accepted business practices and not meeting the requirements of good form, which cost more than 3,000 (Three thousand) rubles or do not comply with the law. If an employee of the Institution is offered such gifts or money, he must immediately notify the immediate supervisor.
    7. An employee of the Institution who in the performance of his duties is offered gifts or other reward remuneration both directly and indirectly that can affect the decisions prepared and/or taken by him or influence his actions (inaction), must:

reject them and immediately notify the immediate supervisor of the fact of the gift (reward) offer;

if possible, exclude further contacts with the person who offered a gift or reward, unless it is related to business need;

if it is not possible to reject or return a gift or reward, transfer it with a corresponding official note to take appropriate measures to the President of the Institution and continue working in the manner prescribed in the Institution on the issue with which the gift or reward was associated.

* 1. In the event of a conflict of interest or the possibility of a conflict of interest in receiving a business gift or tokens of business hospitality, an employee of the Institution is required to notify the official of the Institution responsible for fighting corruption in writing in accordance with the conflict of interest disclosure policy approved by the local regulatory act of the Institution.
  2. Employees of the Institution are not allowed to:

accept proposals from organizations or third parties for the delivery of business gifts and the extension of tokens of business hospitality, business gifts and tokens of business hospitality during business negotiations, when concluding contracts, as well as in other cases when such actions may influence or create impression of their influence on the decisions taken ;

accept business gifts, etc. in the course of bidding and during direct negotiations when concluding agreements (contracts);

request, demand, force organizations or third parties to give them or their relatives business gifts and/or provide tokens of business hospitality in their favor;

accept gifts in the form of cash, non-cash money, securities, precious metals.

* 1. In the case of holding sponsorship, charity programs and events, the Institution must first ensure that the assistance provided by the Institution will not be used for corruption purposes or in any other illegal way.
  2. The Institution may decide to participate in charity events aimed at creating the image of the Institution. At the same time, the budget and the plan for participation in the events shall be agreed with the President of the Institution.
  3. Failure to comply with these Regulations may be grounds for applying disciplinary, administrative, criminal and civil measures to an employee in accordance with applicable law.

# Scope of Application

* 1. This Procedure shall be mandatory for each and any employee of the Institution during the period of work in the Institution.
  2. This Procedure shall be applied regardless of how business gifts and tokens of business hospitality are transmitted, directly or through intermediaries.