

**MCWA Gifts and Entertainment Policy Effective August 13, 2024**

 **Gifts & Entertainment**

In the right circumstances, a modest gift may be a thoughtful “thank you,” or a meal might help strengthen a business relationship. However, if not handled carefully, the exchange of gifts and entertainment can damage MCWA’s reputation, especially if it happens frequently or if the value is large enough that someone could think it is influencing our decisions.

To sustain the health of our key business relationships, no MCWA officer, director, employee, or volunteer in a leadership role, may solicit, accept, or ask for any gift that might influence—or appear to influence—the ability to make objective business decisions that are in the best interest of the Company. The group defined in the previous sentence is referred to as MCWA Leaders in the remainder of this document.

MCWA Leaders may accept an occasional unsolicited courtesy gift so long as the gift has a market value under $50, is customary in the industry, and does not influence or appear to influence the judgment, conduct, or business decisions of the MCWA Leader. The total value of all gifts received by a MCWA Leader from any one source should not exceed $100 per year.

MCWA Leaders may accept an occasional meal and entertainment from a vendor or partner if the vendor or partner is attending the meal or event, and the costs involved are in line with local customs and industry for business-related meals and entertainment.

After board approval, MCWA Leaders may entertain potential or actual vendors or partners if such entertainment is reasonable and consistent with accepted business practices, does not violate any applicable law or ethical standards, and the public disclosure of facts will not embarrass the Company.

MCWA Leaders should be aware that in some situations, provision of gifts or entertainment may violate the law, such as when dealing with government officials. Further, some gifts and entertainment are never acceptable, for example cash or cash equivalents, or any gift or entertainment that would harm the Company’s reputation. In addition, MCWA Leaders are expected to be aware of the organizational rules and standards of those to whom they intend to provide a gift or entertainment. If there is a conflict between their standards and the MCWA’s standards, the more stringent standard will govern.

If offered a gift, meal or entertainment that would compromise this policy and MCWA’s commitment to this practice, MCWA Leaders should extend appreciation for the offer, but must decline and notify the MCWA board.

Any questions regarding this policy should be addressed to the MCWA board.