



Audubon Nature Institute  
Celebrating the Wonders of Nature

EXTERNAL

Department: All

Effective Date: May 1, 2015

Audience: General

Revision Date: December 16, 2024

Policy Name: Personal Gift Acceptance Policy

Facility: Audubon Nature Institute

Approved by:

Laurie Conkerton, Senior Executive Vice President, CAO

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## PURPOSE

To outline appropriate procedures for **personally** accepting gifts from various stakeholders.

## POLICY

This policy should be read in conjunction with other Audubon policies, including but not limited to the *Procurement Policy* and *Code of Ethics*. Anyone who becomes aware of a violation of any Audubon policies, including a potential conflict of interest, is responsible for disclosing that information immediately. For further information, refer to the *Whistleblower protocol*.

Contact the Development Department prior to accepting any gift on behalf of Audubon and refer to *Development's Policies and Procedures* for further information.

### *Gifts from/to Vendors or Public Servants*

Audubon employees shall not solicit or personally accept, directly or indirectly, anything of economic value as a gift or gratuity from a vendor, which is generally defined as any person who has or is seeking a contractual, business, or financial relationship with Audubon, or a public servant. Likewise, Audubon employees shall not give, directly or indirectly, anything of economic value as a gift or gratuity to a vendor or public servant. Note that employees are **specifically prohibited from accepting game tickets, excessive discounts and gift cards** from vendors or public servants. The **only exceptions** to this are:

1. Promotional items having no substantial resale value such as calendars, pens, hats, and t-shirts which bear the company's name or logo

2. Food and drink with value of less than \$79 per instance (limit subject to changes prescribed by the State of Louisiana) consumed while in the presence of the giver or representative of the giver. The limitation of \$79 does not apply to a gathering held in conjunction with a meeting related to a national or regional organization, or to a meeting of a statewide organization of governmental officials or employees.
3. Reasonable transportation and entertainment which are incidental to the food and drink
4. Complimentary admission to a civic, non-profit, educational or political event **only** if that Audubon employee is giving a speech at the event, is on a panel for discussion during the event, or is a program honoree
5. Flowers or a donation in connection with the death of an employee's immediate family member, if the value does not exceed \$100
6. Gifts, meals or entertainment clearly given because of a family relationship or personal friendship
7. Certain gifts, meals or entertainment based on outside business or employment relationships.

Remember also that just because you may accept a gift under one of the exceptions to the gift rule doesn't mean that you must accept the gift. It is never wrong, and is often wise, to decline a gift offered because of your official position. Exercise your discretion but it is never right to accept a gift in return for being influenced.

When dealing with vendors or public servants that are also known donors, guests, sponsors, or clients, employees shall still follow the above guidelines. Meals and entertainment from donors, guests, sponsors or clients may be personally accepted.

Public servants include any federal, state or local public officials. Recognizing that public servants must abide by applicable codes of conducts and policies, Audubon employees should make themselves aware of those codes and policies and abide by them when dealing with public servants.

Employees should contact Procurement & Risk Management if they experience any pressure to accept inappropriate gifts from a vendor.

Gifts that cannot be accepted should be brought to the Procurement & Risk Management Department for donation to an authorized non-profit organization.

### ***Gifts from Guests, Donors or Sponsors***

Audubon employees are specifically prohibited from personally accepting a gift or gratuity from a guest, donor or sponsor that is **cash in any amount** or that is a **material gift (non-cash) of more than token value\***. If a guest, donor or sponsor would like to give an employee a gratuity,

the employee shall notify the interested party that they do not accept gratuities but that Audubon will accept donations in lieu of gratuities and then the employee shall follow *Development's Accepting Cash Gifts Policy*.

Material gifts (non-cash) accepted of more than token value\* must be immediately reported and handed over to the Executive Assistant and, when possible, used in the Zoo to Do Auction. If the item is used in the Zoo to Do Auction, the Zoo to Do Department is responsible for following the *In Kind Donation Policy*. If use in the Zoo to Do Auction is not possible, the item shall be disbursed by the Executive Assistant in a manner decided by the Senior Executive Vice President and Chief of Administration, which is preferably via a raffle among all employees or Department Leaders.

### ***Gratuities and Gifts from Clients***

As is typical in the food service and sports industries, employees serving clients at a Special Event, Fundraising Event, Food and Beverage venue, or at Tennis or Golf facilities are permitted to personally accept gratuities. Additionally, employees working these event are permitted to accept material (non-cash) gifts. Employees working on behalf of our Catering and Concession Contract Partners should check with those companies' policies relating to gratuities and non-cash gifts.

Leftover and usable food, beverage or decoration items shall be retained by the Catering & Concession Contract Partners (SSA & CCHG), , or hosting department based on the discretion of the on-site hosting Department Leader. Those items not retained by the department that are worth less than token value\* may be personally accepted by staff at the discretion of the on-site Department Leader. Leftover food, beverage or decoration items of more than token value\* shall be retained by the on-site Department Leader who shall immediately report them to the Executive Assistant who shall follow the same procedures as noted in the previous section.

\*Items less than token value are generally less than \$100 or items that are promotional and thus not for resale.

For questions, please contact your Department Leader, Procurement & Risk Management, Cecile H. Primeaux, [chprimeaux@auduboninstitute.org](mailto:chprimeaux@auduboninstitute.org) or Laurie Conkerton, CAO [lconkerton@auduboninstitute.org](mailto:lconkerton@auduboninstitute.org) For anonymity, use the *Whistleblower Form*.