

Hospitality and Gifts Policy

Applicable to: All Employees and Members of the Board of Directors

It is essential that Paralympics Ireland operates in a way that is appropriate, publicly defensible and does not give rise to grounds for suggestions of improper influence or conflicts of interest. In this regard, the receipt and offering of hospitality or gifts must be governed by the highest standards and this policy is to assist employees and directors in meeting those standards.

This policy should be read in light of the principle that all employees and directors should avoid giving or receiving gifts, hospitality or benefits which might affect or appear to affect the ability of the recipient or donor to make independent judgement on decisions or transactions involving Paralympics Ireland.

It is accepted that employees and directors should not be put in a position where they cannot accept what are regarded as normal courtesies in business relationships. However, every care must be made to ensure that their acceptance of hospitality or gifts does not influence, and could not reasonably be seen to influence, employees and directors in discharging their official functions.

1. Gifts

In order for a gift to be accepted:

- a) The gift must not be in the form of cash or a cash equivalent (such as a voucher) and
- b) The gift must be valued at €50 or less (for the purposes of calculating this amount gifts from the same source over a 12-month period should be aggregated);

For the purposes of this Policy a “gift” is any item or benefit which is given free of charge or at less than its commercial price. Any gift above an estimated value of €50 should be refused or returned. If refusal or return is impractical the gift should be regarded as a gift to Paralympics Ireland and handed over to the CEO. The CEO will manage these gifts on behalf of Paralympics Ireland, including by disposal or raffle, if deemed appropriate.

Under no circumstances are employees or directors permitted to solicit gifts, directly or indirectly.

Paralympics Ireland are not generally in the practice of providing gifts. There are times when gifts are purchased for specific stakeholder occasions, e.g. Visit to a host NPC, flowers for funerals, weddings etc. these should be valued at less than €100 and be determined by the CEO. If there is an occasion where a gift of above this limit is appropriate (e.g. Long terms staff departure) the CEO will seek agreement from the President for same.

2. Hospitality

In connection with their role within Paralympics Ireland, employees and directors may receive and extend invitations to attend business, sporting or cultural hospitality events in the normal course of business for a sporting organisation and where conflicts of interests or perceptions of bias are not likely to arise.

Such hospitality may include the provision of a working meal or invitations to attend educational, knowledge building or networking forums relating to areas of expertise relevant to Paralympics Ireland, sporting or cultural events that are relevant to programmes of Paralympics Ireland or provide networking opportunities for Paralympics Ireland employees or directors.

Hospitality extended to sponsors and supporter of Paralympics Ireland

In relation to the acceptance of hospitality employees and directors should note the following general guidelines:

- The acceptance of “routine hospitality” will be acceptable in most situations, for example being asked to attend a business lunch. “Routine hospitality” for this purpose depends on factors such as the value of the hospitality offered, the frequency of offers, whether there is an element of reciprocity expected or required and the circumstances in which it is offered.
- In situations where an invitation to attend a business hospitality event satisfies the above criteria employees and directors should still consider whether acceptance or extension of the invitation could give rise to a direct or perceived conflict of interest or perception of bias
- Reimbursement or payment of accommodation and/or travel expenses relating to business hospitality being extended to Paralympics Ireland should not be accepted
- Certain types of hospitality like travel or trips aboard or invitations to attend holiday weekends should not be regarded as routine.
- Employees and Directors are required to use their best judgement in determining the nature of the hospitality offered. If in any doubt he/she should seek the approval of the Board or decline the offer.
- All gifts or hospitality being accepted on behalf of Paralympics Ireland must be made known, for employees to the CEO and for directors and CEO, to the President.

Employees should note that failure to adhere to this Policy may result in disciplinary action.

Members of the board of directors should note that failure to adhere to this Policy may be considered a breach of the Board of Directors Code of Conduct.