Association for Corporate Growth, Inc. Vendor Gift Policy

Purpose

Association for Corporate Growth, Inc. ("ACG") is committed to the highest standards of ethics and business integrity. All vendors and ACG employees are expected to conduct themselves with the highest standards of honesty, fairness and personal integrity. It is critical to ACG that vendors and employees maintain high ethical standards and avoid even the perception of impropriety or conflict of interest. All employees of ACG have a duty to conduct the affairs solely for the benefit of ACG rather than for their own personal or financial gain.

Policy

No ACG employee shall accept or solicit for personal use, or for the use of others, any gifts or favors of monetary value that might influence, or appear to influence, the judgement or conduct of the employee in the performance of their job at ACG. Vendors covered under this policy are past, current and future vendors.

What is Acceptable?

ACG Employees can accept occasional unsolicited courtesy low value gifts or common courtesies usually associated with customary business practices. These include, but are not limited to, business lunches, holiday baskets and flowers so long as the gifts or favors have a total market value under \$100 per calendar year cumulatively for each vendor, are customary in the industry, and do not influence or appear to influence the judgement or conduct of the employee. Gifts of cash or cash equivalents (such as gift cards or gift certificates) <u>must never be accepted</u>.

Employee's Responsibility

Employees of ACG are required to inform vendors or potential vendors and others of this policy and request that they comply. <u>Employees who are unsure should adopt the position of not accepting any gifts from vendors</u>. Any potential situation which may involve a violation of this vendor gift policy or a conflict of interest shall be disclosed promptly to the CFO prior to receiving or accepting any gifts from vendors. Gifts that violate this policy are to be returned to the vendor.