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## **MTS Gifts and Business Courtesies Policy**

### **Policy Highlights**

The MTS Gifts and Business Courtesies policy (OGC-009) helps reduce and eliminate conflicts of interest that could arise from giving or receiving business gifts.

- We have a \$100 limit on giving or receiving a gift, business courtesy or service in any MTS fiscal year.
- It is important to know the rules that govern the receiving organizations gifting policy as well. Some companies prohibit gifts and when they are received it may cause a problem or embarrassment for both parties.
- The following is a partial list of the gifts that are never appropriate:
  - Gifts of cash, or cash equivalent (such as gift cards or gift certificates);
  - Gifts that are in violation of applicable laws (*see MTS Policy on Foreign Corrupt Practices Act Compliance*) or ethical standards;
  - Gifts given as a bribe or kickback;
  - Gifts or business courtesies, of any kind, to or from U.S. Government employees

Integrity is one of the MTS core values and we have high expectations for our conduct.

For further information regarding MTS Gifts and Business Courtesies Policy, please contact [kim.kaminski@mts.com](mailto:kim.kaminski@mts.com)