Vendor Gift and Invitation Policy

Policy Statement
Columbia University is committed to upholding the highest standards of ethical conduct and to ensuring that the integrity of the institution and of all of its constituent members remains above reproach. In keeping with this commitment, all members of Columbia University community are to avoid not only actual conflicts of interest, but also the appearance of conflicts of interest, as both are harmful to the institution and to the individual involved. Because of the personal nature of vendor gift-giving and invitations, faculty, staff and other representatives of the University are expected to recognize and appropriately address vendor situations giving rise to conflict of interest concerns. All University employees are prohibited from accepting gifts from vendors and are discouraged from accepting invitations.

Reason for the Policy
This policy provides guidance to the University community on how to respond to vendor gift-giving and invitations to attend vendor-sponsored events and purely social events.

Primary Guidance to which this Policy Responds
This policy responds to the University Policy on Conflicts of Interest.

Responsible University Offices & Officers
Procurement Services
Vice President, Procurement Services

Who is Governed by this Policy
All Columbia University employees.

Who Should Know this Policy
All Columbia University employees.

Exclusions and Special Situations
None

Policy Text
Any circumstances which could cast doubt or the appearance of doubt upon an employee’s ability to act with objectivity with regard to the University’s interests presents a potential conflict of interest situation. As described in the University’s Policy on Conflicts of Interest, vendor gifts exemplify the kinds of conflict situations that may arise:

potentially self-dealing conflict(s) may arise [when an employee] accepts gratuities or special favors from any organization doing business with the University where the offering or acceptance of such gratuities or special favors could be viewed as potentially interfering with the [employee’s] proper discharge of his or her responsibilities to the University.
To avoid even the appearance of a conflict of interest, the University requires that employees do not accept gifts of any kind from vendors and carefully evaluate the benefits of invitations to events.

**Gifts**

All University employees are prohibited from accepting vendor gifts.

Gifts that are received should be returned to the vendor as soon as possible. Gifts that cannot be returned as a practical matter, such as food and gift baskets, and “de minimus” gifts, such as mugs, tote bags and other promotional items, should be shared with others in your department.

Vendors regularly doing business with the University are notified of this policy annually.

**Invitations**

Occasionally, vendors will extend personal event invitations to University employees. Acceptance of invitations to events is generally discouraged and should be evaluated carefully for the appearance of a conflict of interest.

An invitation to a vendor-sponsored event should not be accepted unless (i) there is a business-related purpose, (ii) invitations are being offered generally to all clients, and (iii) the value of the event is reasonable.

Invitations to purely social events, including plays, concerts, sporting events, and other entertainment, are subject to particular scrutiny and should be evaluated according to whether acceptance could present the appearance of a conflict of interest.

Prior to accepting any invitation, an employee should consult with his or her supervisor, or the appropriate University officer, regarding the appearance of a conflict of interest. If prior consultation is not reasonably practicable, the employee should exercise prudent judgment in evaluating the invitation and promptly disclose the action taken.

In most cases, the University should pay for all identifiable costs (e.g. the stated value of a ticket) and incidentals (e.g. the cost of transportation to the event) related to attending, and these expenses are required to be approved in accordance with University policy.

University employees are permitted to attend working groups or similar meetings where a meal is served and lunches or other meals of reasonable value to discuss business.

**Appendix**

**Statement of University Policy on Conflicts of Interests**