**Vendor Relations and Gift Policy Guidance**

Date Established: **August 2020**

Amended:

HTA deals with vendors on a regular basis. From time to time vendors will offer staff, volunteers and board members gifts, entertainment and other benefits. In an effort to be abundantly clear that this association will not be swayed by such things, we have established this policy to act as a guide.

1. **Definitions:**
   1. Gifts: include, but are not limited to, free hotel nights, free services at hotels, tickets to sporting/entertainment events, free hoof trimming products
   2. Vendor: all persons or companies that the association does business with, may do business with or may never do business with
   3. HTA Representative: volunteer, employee, staff or board member
2. **Acceptance:** HTA representatives may accept gifts, entertainment and other benefits from vendors, so long as they are modest in value and not intended to improperly influence decision making with respect to HTA decisions.
3. **Value:** The acceptability of proffered gifts based on value:
   1. Gifts under $50 or totaling $50 over the course of one calendar year may be kept without reporting them to the association.
   2. Gifts over $50 but less than $200 or totaling less than $200 over the course of one calendar year may be kept, but must be reported to the association.
   3. Gifts over $200 or totaling more than $200 over the course of one calendar year may not be accepted.
4. **Exclusivity:** Gifts offered to the general population, such as attendance at a party, dinner or other gathering at which it is expected other HTA members will be in attendance and is open to general attendance are acceptable without being reported to the association. Private, exclusive invitation events or gifts may be accepted based on the Value guidelines as defined herein.
5. **Prohibitions:** Under certain circumstances HTA representatives are prohibited from receiving all gifts regardless of value.
   1. Gift would create the appearance or an implied obligation that the gift giver is entitled to preferential treatment, an award of business, better prices or improved terms;
   2. Would embarrass HTA or the gift giver if disclosed publically;
   3. Are of cash or cash equivalent;
   4. Prohibited by law;
   5. Given as a bribe, payoff or kickback;
   6. “Adult” entertainment of any sort of event involving nudity or lewd behavior;
   7. Gifts given to family members for the intent of circumventing this policy;
   8. Solicited by the HTA representative
6. **Exceptions:**
   1. From time to time there may arise a situation where an HTA representative receives a gift at an event of a ceremonial nature that might not be appropriate under these guidelines, but is impractical or offensive to refuse. The gift should be accepted and must then be promptly reported to the board of directors. The board will then make the appropriate determination on the fate of the gift.
   2. HTA representatives may participate in vendor-sponsored demonstrations of products or services under consideration for purchase and use by HTA or the HTA representative’s own but related business. Moderate meals, lodging and travel may be provided by the vendor during such demonstrations if the estimated cost of the product or service warrants the travel and if it is not reasonable to conduct the demonstration at a location near the recipient.
   3. HTA representatives may participate in vendor-sponsored training where the training is directly related to a product or service sold by the vendor and is appropriate to the hoof trimming industry.
   4. From time to time vendors may ask HTA representatives to serve on customer advisory boards or to participate in meetings or focus groups to evaluate products or services or to compare best practices.
   5. Vendors may furnish modest honorariums and reasonable travel expenses in connection with speaking engagements.
7. **General Gift Rules:**
   1. Must be infrequent;
   2. Reasonably related to a legitimate business purpose;
   3. Not given as a bribe, payoff, or kickback;
   4. Reasonable and appropriate in the context of the business occasion;
   5. Would not influence or appear to influence the individual’s ability to act in the best interest of HTA;
   6. Must be disclosed as appropriate;
   7. Must comply with specific limits established herein
   8. Gifts given to family members are considered gifted to the HTA representative
   9. Vendors and HTA representatives may not attempt to circumvent the application of this policy or other policies by furnishing or accepting items through third parties. HTA representatives should not request vendor support for an activity that is not permitted by this policy.