



Grand Canyon Education Policies & Standards

Policy Name:	Supplier Gift Policy	Pages:	3
Department:	Procurement	Policy Number:	PRC 800
Subsection:		Effective Date:	June 1, 2010
		Revision Date:	July 1, 2018 May 6, 2019

Overview

The purpose of this policy is intended to clarify and define the limits of acceptable employee behavior within Grand Canyon Education, Inc. ("GCE"). It is recognized and understood that some departments may opt for a more stringent or "no tolerance" policy. Further, this policy in no way exempts employees from conformance with specific Codes of Conduct for their respective professions.

GCE is committed to an environment that fosters open decision-making, practices, and policies. Employees are expected to uphold the integrity of GCE in the highest manner when conducting business operations for GCE with outside organizations, partner companies, suppliers, and individuals. Along with prudent business judgment, employees should not compromise business transactions in exchange for personal gifts. GCE wants to ensure that it is selecting suppliers based upon price and the quality of their respective products and services.

Scope

This policy applies to all employees, partner institution employees, suppliers, contractors and subcontractors.

Definitions

Gift is defined as a tangible or intangible item of any value received from external sources, directly or indirectly by the employee of GCE. This includes such things as meals, gift cards, material goods, travel and accommodations, tickets to sporting or cultural events, golf outings, and any other merchandise or services.

Policy

Typically, business gifts, services, gratuities, and entertainment are forms of courtesies designed to build and/or enhance teamwork, partnerships, and goodwill between various business entities and suppliers. Ethical problems arise when these items compromise an individual's ability to make objective and fair business decisions. Unfortunately, even the



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perception of compromise to an outside observer can be very damaging to the image of a department and inconsistent with GCE's overall operating principles.

For these reasons, unless an employee has received prior approval from their C-suite executive, employees should not accept the following list of gifts from suppliers, potential suppliers, or partner companies:

- a. Any gift that is given as cash or gift cards
- b. Any gift exceeding \$100 in value (except as allowed for below)
- c. Any gift given during negotiations and/or bid process; or
- d. Any gift given with the intent of seeking any advantageous action by, or relationship with, GCE.

GCE employees can however accept the following from suppliers, potential suppliers, or partner companies with their manager's prior approval:

- a. A plaque or an award;
- b. Items of insignificant value that are commonly given to everyone (including key chains, t- shirts, coffee mugs, bags, etc.);
- c. Business meals; or
- d. Tickets to local entertainment.

These types of gifts are permitted, provided that they are not excessive in frequency, they are given as a gesture of a professional relationship, do not involve a commitment having to do with the transaction of business, and do not otherwise create the appearance of impropriety.

Employees are prohibited from requesting gifts, services, gratuities, or access to entertainment activities from any suppliers, potential suppliers or partner companies.

A decision to accept or decline invitations or gifts requires common sense and careful judgment. Employees must carefully weigh the business interest involved against the possible public perception. In difficult situations, the following guiding questions can be asked:

- Is it clearly related to the conduct of business?



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- Is it moderate, reasonable, of nominal value, and in good taste?
- Would I feel comfortable owning up to the giving or receipt of this gift in front of other customers and suppliers? Other employees? My manager? My family? The Media? Do I feel any pressure to reciprocate or grant special favors as a result of this gift?
- Am I certain the gift does not violate any law or business regulation?

If employees are still uncertain about specific situations, they should consult their managers to obtain an objective perspective of the situation and should always choose the most cautious approach to avoid even perceptions of impropriety.

Enforcement

Any individual found to have violated this policy may be subject to the disciplinary measures below:

- For employees and partner institution employees, such noncompliance is to be reported to the employee's supervisor. Any employee found to have violated this policy may be subject to disciplinary action, up to and including termination of employment.
- For suppliers, contractors and subcontractors, such noncompliance is to be reported to Procurement Department or the Company division responsible for monitoring the performance of the applicable contract.

Related Policies

None

Revision History

Date	Version: Original or Revised	Approved By:
06/01/2010	Original	Dan Bachus
07/01/2018	Revised due to Company transition	Dan Bachus
04/29/2018	Revised to expand the scope of this document to include others outside of employees.	Kate Vincent