

<b>Policy Number and Title:</b>	10.01 Gifts, Meals, Event Attendance
<b>Policy Section and Chapter:</b>	Human Resources – Employee Relations
<b>Policy Owner &amp; Contact:</b>	Human Resources – (940) 349-8355
<b>Policy or Directive:</b>	Policy
<b>Last Revision Date:</b>	00.00.0000

**POLICY PURPOSE STATEMENT**

The purpose of this policy is to establish clear guidelines regarding the receipt and provision of gifts, meals, and event invitations by City employees in the course of their official duties. These standards are intended to prevent actual or perceived conflict of interest, promote ethical conduct, and ensure all business interactions are conducted with transparency, fairness, and public trust.

City employees must not accept or offer any item of value – regardless of the amount – if doing so could be reasonably perceived as influencing a business decision, creating a conflict of interest, or impairing the employee’s objectivity.

**POLICY**

**I. Gifts, Meals, and Events**

**A. Gifts or Favors**

Employees are prohibited from soliciting or accepting gifts, favors, or other items of value from individuals, vendors, or organizations with whom they engage through their position at the City, unless specifically permitted by this policy.

1. The following are prohibited:
  - a. Any gift or favor provided in exchange for an official act (i.e., quid pro quo)
  - b. Any form of bribery, as defined under Texas Penal Code §36.10
  - c. Cash or Cash Equivalents (e.g., gift cards), regardless of the source or purpose, for recognition, appreciation, or employee-related events
  
2. Permitted Exceptions Include:
  - a. Promotional items of nominal value (e.g., pens, keychains) provided to the general public or all event attendees
  - b. Perishable items of nominal value given by members of the public, vendors, or organizations in appreciation of an employee or a department, provided the items are placed in a shared area
  - c. Gifts from coworkers, family, or personal friends outside of work-related expectations or circumstances
  - d. Items received at internal City-sponsored events (e.g., wellness fairs)
  - e. Items of nominal value received for recognition, provided they are not cash or cash equivalents

- f. Discounts made available uniformly to all City employees ([Solicitation Policy #114.01](#))
- g. Employees may participate in drawings that occur during approved events such as professional conferences, provided any prize is of nominal value (e.g., books, t-shirts, mugs)

Employees must use sound judgment and are encouraged to consult with their supervisor or Human Resources if unsure whether an exception applies. If a gift or favor cannot be respectfully declined and does not meet these exceptions, the employee must report the item or favor using the City's Gift Disclosure Form within three (3) business days.

### 3. Disclosure requirements:

- a. All gifts not clearly falling within the permitted exceptions must be refused or reported using the City's Gift Disclosure form.
- b. Gifts that do not meet exception criteria must be returned, if possible, or donated following Section E – Disclosure.

## **B. Meals**

Employees may not solicit or accept meals from individuals, businesses, or organizations in connection with their role at the City, unless specifically permitted under the exceptions listed below. Employees are responsible for avoiding situations that may give the appearance of favoritism, impaired judgement, or conflict of interest.

### 1. Permitted exceptions include:

- a. Meals provided as part of a scheduled event approved by the employee's supervisor, included in the event's registration or itinerary, and equally available to all participants
- b. Meals occurring during the course of essential duties that cannot be reasonably avoided, and are paid for separately by each participant or the City – any portion covered by a third party must be disclosed using the Gift Disclosure Form
- c. Meals offered through a publicly advertised discount or program extended to all City employees
- d. Meals provided at community events where attendance is required as part of the employee's official responsibilities
- e. Meals provided by a coworker, family member, personal friend, or unrelated business associate and is clearly independent of the employee's City role and are not offered in exchange for any action or influence.
- f. Items such as occasional snacks, coffee, doughnuts, etc., which are de minimis.

Employees must use sound judgment and are encouraged to consult with their supervisor or Human Resources if unsure whether an exception applies. If a meal cannot be respectfully declined and does not meet these exceptions, the employee must report using the City's Gift Disclosure Form within three (3) business days.

### 2. Disclosure requirements:

- a. All meals not clearly falling within the permitted exceptions must be refused, or if unable to refuse, reported using the City's Gift Disclosure form.

### **C. Events**

Attendance at external events must serve a legitimate training or business purpose and be approved in advance by the employee's chain of command. Events may include, but are not limited to, conferences, off-site meetings, trade shows, or educational workshops. All travel and related expenses must comply with [Policy 408.01 – Travel Expenses](#) and [Policy 408.03 – Reimbursement for Professional Development Activities](#).

Employees must avoid participating in event-related meals, entertainment, or social functions that could reasonably be interpreted as influencing their professional judgment or providing them with a personal benefit due to their City role.

Employees may not accept discounted or complimentary event benefits – including registration fees, travel, lodging, or meals – from individuals, vendors, or organizations that have, or may have, a business relationship with the City, unless specifically allowed under the exceptions below.

#### **1. Permitted Exceptions Include:**

- a. Discounts that are broadly available to all government employees or event attendees (e.g., government lodging rate, conference multi-attendee discount)
- b. Meals that meet one of the meal exceptions listed in Section B – Meals of this policy
- c. Scholarships or grants awarded by a non-vendor entity with no business interest in the City
- d. The benefit is offered as part of a widely attended event (e.g., symposium, conference) where the employee is a speaker or panelist, and the invitation is unsolicited
- e. The employee receives the benefit as a board or committee member, and is provided equally to all members based on their position, not due to their employment with the City
- f. The benefit is provided at an event offered to all attendees at no cost (e.g., complimentary skills-based training)
- g. Employees may attend vendor-sponsored activities provided they meet certain criteria (e.g., not in current bidding process, event open to other public organizations, benefit does not exceed nominal value.)

#### **2. Disclosure requirements:**

- a. All events not clearly falling within the permitted exceptions must be refused, or if unable to refuse attendance, reported using the City's Gift Disclosure form.
- b. Event tickets or invitations that do not meet exception criteria must be returned, if possible, or donated following Section E – Disclosure and Donation.

#### **D. Exceptions**

If a gift, meal, or event does not meet the exceptions outlined in this policy, and an employee believes attendance is necessary for their essential job duties, they may request prior approval from their chain of command and the City Manager or their designee.

In reviewing specific exceptions, the City Manager or their designee must consider the gratuitous nature of the gift, meal, or event and whether it is likely to unduly influence the employee or interfere with the objective performance of the employee's official duties or will have the appearance of doing so. If, in the sole discretion of the City Manager or their designee, it is determined that acceptance of a particular gift, meal, or event attendance is reasonably likely to cause the employee to demonstrate biased behavior or preferential treatment or have the appearance to other employees or the public of doing so, the request for an exception will be denied.

#### **E. Disclosure and Donation**

Proactive steps should be taken to inform individuals, businesses, and organizations of the City's policies regarding gifts, meals, and events. Any unsolicited gifts received by an employee, department, office, or work group that do not meet the policy exception criteria is considered property of the City. Every effort should be made to politely decline or return the gift to the sender. If unable to decline or return the gift, a Gift Disclosure form must be completed, and the item should be taken to Human Resources for donation to an approved organization. The sender should be contacted to express appreciation and explain the City's policy on gift acceptance. In addition to these gifts, any unsolicited meals that cannot be declined and do not meet the listed exceptions must be disclosed. Employees must disclose all such gifts and meals as soon as possible, but no longer than three (3) business days from receipt.

### **ROLES AND RESPONSIBILITIES**

#### **I. City Manager or Designee**

- a. Reviews and evaluates exception requests for gifts, meals, or events that do not meet policy criteria.
- b. Evaluate whether acceptance would create undue influence or the appearance of favoritism.
- c. Deny requests when acceptance could impair objectivity or public trust.

#### **II. Employee**

- a. Employees are responsible for ethical conduct and compliance with all requirements.
- b. Avoid accepting prohibited gifts, meals, or event benefits and decline items when possible.
- c. Use sound judgment and seek guidance when unsure.
- d. Disclose non-permitted gifts or meals within three business days.

#### **III. Human Resources**

- a. Responsible for administering the policy and providing guidance to employees and supervisors when they are unsure whether a gift, meal, or event qualifies for an exception.

- b. Receive and process Gift Disclosure Forms, including logging items and ensuring proper handling.
- c. Coordinate donation of non-permitted gifts to approved organizations.
- d. Maintain and update the policy as the policy owner.

#### IV. **Supervisor**

- a. Inform vendors and community partners about the City's restrictions on gifts and meals.
- b. Ensure compliance at the operational level and approve employee participation in events or meals when required by the policy.
- c. Review and approve exception requests before they are elevated to the City Manager.
- d. Monitor employee conduct to ensure gifts, meals, and event attendance do not create conflicts of interest.
- e. Coordinate delivery or deliver non-permitted items to Human Resources.

#### **DEFINITIONS**

- **Benefit** – Any form of financial gain or advantage, including any such gain provided to another individual, is of direct and significant importance to the recipient.
- **Cash or Cash Equivalents** – Cash or Cash Equivalents are defined as physical currency or any stored-value item that functions like cash, such as gift cards, prepaid cards, or gift certificates. Cash or Cash Equivalents are taxable and treated as income. Receipt of such must be disclosed (See Section E).
- **De minimus** – The value and frequency is so small that it makes it impractical to account for; examples are coffee mugs, pens, t-shirts. These are not taxable.
- **Favor** – A Favor is a special advantage, privilege or right granted or conceded; an action or omission that provides a benefit to an individual or entity in a way that deviates from generally accepted standard practices or policies; or an act or omission providing a benefit that results in a real or perceived conflict of interest. Examples include waiving fees, providing non-public information, or expediting service for personal or political gain.
- **Gift** – A Gift is any item or benefit, tangible or intangible, that could reasonably be perceived as providing a personal advantage or influencing an employee's actions or decisions. This includes, but is not limited to, cash, cash equivalents, merchandise, food, meals, transportation, lodging, entertainment, use of facilities, or discounts not available to the general public.
- **Nominal Value** – Nominal Value refers to an item or benefit valued at less than \$50 per employee, per event, per source, and per calendar year. This threshold helps define what may be accepted under specific policy exceptions.
- **Perishable Items** – Perishable Items include fresh foods or goods – such as fruit, baked goods, or flowers – that are not shelf-stable and have a limited usable life (typically less than a few days).

#### **REFERENCES**

- City Policy 10.00 – Ethics
- City Policy 109.01 – Corrective Action
- City Policy 114.01 – Solicitation
- City Policy 408.01 – Travel Expenses

- City Policy 408.03 – Reimbursement for Professional Development Activities
- City Policy 409.05 – Comprehensive Driving and City Vehicle Use
- **Texas Penal Code** – [Sec. 47.02. GAMBLING - Texas Penal Code](#)

## REVISION HISTORY

Revision Date	Policy Owner	Summary
4/17/18	Director of Procurement & Compliance	<ul style="list-style-type: none"> <li>• Initial Policy</li> </ul>
2/11/20	Director of Procurement & Compliance	<ul style="list-style-type: none"> <li>• General policy updates</li> </ul>
11/16/21	Compliance Officer	<ul style="list-style-type: none"> <li>• General formatting changes</li> <li>• Addition of “potential conflicts of interest” into disclosure and recusal requirements and notice that failure to disclose actual conflicts of interest may result in disciplinary action.</li> <li>• Prohibition on providing Cash or Cash Equivalents in certain situations.</li> <li>• Clarifications on Gifts, Meals, and Events definitions and exceptions.</li> <li>• Requirement for approval forms to be completed annually for external secondary employment.</li> <li>• Prohibition on retaliation for reporting unethical conduct and inclusion of Fraud in example of unethical behaviors.</li> </ul>
XX/XX/2026	Director of Human Resources	<ul style="list-style-type: none"> <li>• Gifts, Meals, Events separated from Ethics Policy 10.00</li> <li>• General formatting changes</li> <li>• Updated “Nominal Value”</li> <li>•</li> </ul>