



Stenson Tamaddon Gift Policy

February 2, 2024

I. Introduction

1. StenTam competes for business and pursues business objectives solely on the merits. To that end, before you give or receive any business gift, you must ensure it is consistent with this policy and StenTam's Anti-Corruption Policy. Giving or accepting business gifts can create a real or perceived conflict of interest, can lead to a perception of favoritism, and can create an expectation of reciprocity that could compromise your objectivity, even inadvertently. It can also be viewed as a bribe.

II. Business Gifts

1. Definitions

a. "Anything of Value" means anything that could be valuable to a recipient, including, but not limited to, cash, cash equivalents (*i.e.*, gift cards and checks), gifts, hospitality (travel, meals, and entertainment), electronic devices, real, tangible, and intellectual property, donations, employment, and sponsorships.

b. "Business Gift" means (a) any modest, customary business courtesies that are reasonable in value and frequency and are transparently given and accepted (*e.g.*, occasional business-related meals or promotional items of nominal value); and (b) anything of value given by or on behalf of StenTam or received by a StenTam employee from a current or prospective client, business partner, or third-party to build goodwill or further business relationships, without expecting anything in return.

c. "Government Official" means any federal, state, local, municipal, or foreign government employee, officer, director (whether elected or appointed), contractor, consultant, or representative hired/engaged by or authorized to act for or on behalf of any government or any candidate for any position therein.

2. General Rule. The giving or receipt of any Business Gift must have a legitimate, bona fide business purpose, be reasonable in value and frequency, be appropriate for the occasion, and be conducted in a transparent matter.

3. Acceptable Business Gifts

a. Business Gifts that may be offered, given, or accepted, without prior approval, include:

- (1) Commentative, promotional, or marketing items of nominal value (*e.g.*, pens, calendars, mugs, etc.);
- (2) Meals related to or during business dealings, meetings, or development; and

- (3) Modest refreshments not part of a meal (e.g., coffee and donuts during a meeting).

b. Business Gifts that may be offered, given, or accepted, with prior approval, include:

- (1) Travel and lodging;
- (2) Entertainment, including tickets to concerts and sporting events;
- (3) Any item not covered by 3a above or prohibited by 4, below.

c. Any request for prior approval must be submitted via email in advance to the StenTam Chief Legal Officer, or his designee, and include a description of the Business Gift, the identity of party or parties involved and their relationship to StenTam, the market value of the Business Gift at the time of the request, and any prior Business Gifts offered or given to the same party or parties within the prior twelve months. In addition, the StenTam Partners may approve any Business Gift at their discretion.

4. Prohibited Conduct. No employee is authorized or permitted to do any of the following:

a. Offer, give, or accept anything of value in exchange for or in expectation of:

- (1) Influencing any kind of business decision;
- (2) Receiving or providing an improper business advantage; or
- (3) Influencing an individual to act in an illegal manner or to not fulfill a legal duty of any kind.

b. Offer or give anything of value to any Government Official. Government Officials are often subject to rules and restrictions that do not apply to the private sector and, under certain circumstances, the offering or giving of anything of value to a Government Official may be a crime.

c. Offer, give, or accept anything of value to or from any client, prospective client, or former client.

d. Offer, give, or accept any lavish gift (e.g., expensive wines, vacations, appliances, cars, etc.), cash, or cash equivalent, such as gift cards or checks, to or from any client, prospective client, or former client or any person or business doing business with, or seeking to do business with, StenTam.

e. Offer, give, or accept anything of value during any contract bid, negotiation, or renewal with any individual or organization involved in such bid, negotiation, or renewal.

f. Direct, advise, aid, or agree with any person to engage in any of the prohibited acts referred to in this Paragraph. For example, it is prohibited to direct a third-party to give anything of value to a family member in an effort to circumvent this policy.

5. Business Gifts that are contrary to the policy must be declined and returned whenever possible. If it is impossible or inappropriate to refuse or return a Business Gift, you should notify your manager immediately after receipt of the item.

6. Violation of this Policy. Violation of this policy may result in disciplinary action, up to and including termination of employment.

The StenTam Chief Legal Officer is the proponent of this policy. Any questions concerning this policy should be addressed to the Chief Legal Officer, or his designee.