

# Juilliard

<b>Title:</b>	Gifts from External Parties Policy
<b>Policy Owner:</b>	Office of the General Counsel
<b>Contact Information:</b>	Room 225 Main Building (212) 799-5000, ex. 231 <a href="mailto:OGC@juilliard.edu">OGC@juilliard.edu</a>
<b>Applies to:</b>	All members of the Juilliard School community, including faculty; staff; members of the Board of Trustees; employees; volunteers; students who are acting as employees or volunteering as part of a Juilliard sponsored program, activity, or event; interns; contractors; consultants; agents; and other persons and organizations acting on the School's behalf. This includes all affiliates and other entities formed by the School, and any joint ventures the School participates in, whether or not the School owns the majority interest.
<b>Effective Date:</b>	March 1, 2018

## Policy Statement

Generally, representatives of the School cannot accept Gifts (as defined below) from outside sources for personal benefit. In some instances, if it furthers the objectives of the School, promotional materials and business meals may be acceptable. Members of the Juilliard community are expected not to allow the receipt of personal Gifts to alter the terms of business transactions they enter into on behalf of the School.

## Reason for the Policy

This Policy governs the conduct of members of the Juilliard community who conduct business with outside entities and provides guidance on when a representative of the School may accept a Gift from one of these entities.

## Definitions

- Gift – Any tangible or intangible item of any value received from external sources, directly or indirectly, by a representative of Juilliard.

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- Immediate Family Member – Immediate family is defined as including an individual's: (i) spouse or domestic partner; (ii) children or children of spouse or domestic partner; (iii) siblings or siblings of spouse or domestic partner; (iv) parents or parents of spouse or domestic partner; and (v) grandparents or grandchildren.

## Policy Text

Gifts to representatives of Juilliard or their Immediate Family Members are generally prohibited, with a limited number of exceptions, which are listed below. Accepting cash or gift cards is prohibited under all circumstances.

Representatives of Juilliard can, however, accept the following:

- A trophy, a plaque or an award;
- Token items of insignificant value (e.g., T-shirts, bags, pens);
- Informational materials (e.g., booklets, audio or video tapes);
- Non-cash raffle prizes or draws at conferences or similar events attended by a Juilliard representative (cash prizes must be used to offset the expenses associated with the event/conference);
- Goodwill exchange Gifts when Juilliard representatives are on a mission abroad or visiting other domestic institutions or when officials from other institutions visit the School. If the Gifts are of significant value (greater than \$150), they become the property of the School and should be discussed with the recipient's department head; and
- Business meals with a prospective vendor or at professional meetings and conferences, if the School gains from such attendance. For example:
  - When individuals authorized to issue purchase orders visit a vendor as part of an investigation of that vendor's capability to service the School, or to review a new product or new facilities;
  - When individuals perceive that continuing discussions with a vendor through mealtime would benefit the School.

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Repetitive mealtime meetings should be discouraged. Meals paid for by outside entities associated with pure entertainment, where Juilliard business is not discussed, are not considered business meals and are prohibited by this Policy.

Juilliard allows outside entities to pay for reasonable and necessary meal expenses incurred during a business meeting if the purpose of the meeting is to discuss School business.

## **Consequences**

Failure to comply with this policy may result in disciplinary action, up to and including termination of employment.

## **Reporting Suspected Violations and Questions Regarding this Policy**

To report violations of this Policy or for further information, please contact the Office of the General Counsel.

## **Cross References to Related Policies**

- Anti-Corruption Policy