

## **Guidelines for Using MassMutual-Branded Promotional Items:**

### **Important Policy Reminders**

#### **Giving or Accepting Gifts\***

It is important that gifts or promotional items exchanged in the normal course of business be appropriate. You should generally neither give nor receive expensive gifts or other benefits. Never accept or give gifts of cash or cash equivalents (such as gift certificates). You may accept or give occasional, inexpensive gifts or promotional items (such as t-shirts, mugs, and other logo items) if doing so is legal and the gift is neither intended nor likely to be perceived by others as an attempt to influence business decisions.

Any gifts given must be accurately disclosed in the appropriate expense report. It could be unlawful to offer any gift, travel expense, entertainment or meal, regardless of cost, to a person who works for a federal, state or local government entity. See Statement 6 of this Code for more detail.

\*From MassMutual's Code of Conduct, p. 10

#### **Outside Gifts and Flowers**

Please refer to these guidelines for gifts given to people other than MassMutual employees:

Outside gifts, with the exception of nominal gifts in conjunction with a meeting where business is discussed, should not be offered or accepted. On occasions when a gift is considered an appropriate business activity (such as a gift to a client or broker), gift expense reimbursement will not exceed \$25.

While MassMutual may pay for the reasonable travel expenses of non-MassMutual participants in business-related functions (such as broker recognition meetings), government employees are subject to a variety of rules, regulations and statutes that generally prohibit them from accepting gifts, business courtesies, travel expenses, etc. Do not offer or give business courtesies or gifts to any governmental employee or appointed/elected official.

#### **Rewards and Recognition for MassMutual Employees**

Expenses for items used as rewards and recognition for MassMutual employees cannot exceed \$100 a year per employee. When purchasing promotional items for internal use, they must be charged against your department budget code against the minor code for Employee Recognition. Flash drives are not approved MassMutual equipment, therefore should not be purchased for internal use.

### **Special-Order MassMutual Promotional Items**

Whenever possible, you should use items from the approved MassMutual catalog. If you do need to consider special orders of MassMutual promotional items, make sure your items directly support MassMutual's business objectives and that they are appropriate for the intended audience. In addition, you must obtain approval from your cost center manager. Orders may also be reviewed by the Promotions Gatekeeper.\* Please note that flash drives should not be used as gifts for MassMutual employees.

\*The Promotions Gatekeeper will review all catalog orders over \$100 and special and custom orders.