Conflicts of Interest: “Normal” Business Courtesies. Is there such a thing?

Decision Tree for ACCEPTING a Business Courtesy

1. Is this business courtesy cash?
   - YES
   - NO
2. Is this business courtesy of modest value?
   - NO
   - YES
   - To approving officer
3. Is there a legitimate business purpose for accepting the business courtesy?
   - NO
   - YES
   - To approving officer
4. Is this intended or might this give the appearance of an unfair business advantage?
   - YES
   - NO
   - To approving officer
5. Might public knowledge of this business courtesy cause embarrassment to or reflect negatively on you, PCL, the person giving the gratuity or that person’s employer?
   - YES
   - NO
   - To approving officer

Acceptable

Unacceptable
Conflicts of Interest: “Normal” Business Courtesies. Is there such a thing?

**Decision Tree for GIVING a Business Courtesy**

Is this business courtesy cash?
- **YES**
- **NO**

Is this business courtesy prohibited by applicable laws?
- **YES**
- **NO**

Is the business courtesy prohibited by the policies of the recipient's employer?
- **YES**
- **NO**

Is the business courtesy of modest value?
- **NO**
- **unsure**
- **YES**

→ To approving officer

Don't Approve

Is there a legitimate business purpose for giving the business courtesy?
- **NO**
- **unsure**
- **YES**

→ To approving officer

No

Is this intended or might this give the appearance of obtaining an unfair business advantage?
- **YES**
- **unsure**
- **NO**

→ To approving officer

Might public knowledge of this business courtesy cause embarrassment to or reflect negatively on you, PCL, the recipient or their employer?
- **YES**
- **unsure**
- **NO**

→ To approving officer

Yes

No