

THE BRINSON FOUNDATION

POLICY REGARDING GRANTEE GRATUITIES

Except as otherwise provided below or specifically approved by the Board of Directors, Members, Directors, Officers and employees of the Foundation may not accept gifts, tickets, meals, entertainment or any other personal benefits or gratuities from potential or existing grantees if the offering of such benefits is directly or indirectly related to Foundation activities. The foregoing prohibition also applies to a member of a Member's, Director's, Officer's or employee's immediate family (i.e., a spouse, parent, child or other individual living in the same household). Notwithstanding the foregoing:

- a.) A Director, Officer or employee who has responsibility for evaluating a potential or existing grantee may accept any of the foregoing benefits to the extent such benefits are reasonable in amount and are offered in the context of such individual's introduction to, or review or evaluation of, a potential or existing grantee's management, programs or activities.
- b.) A Member, Director, Officer or employee and members of his or her immediate family may attend a grantee's donor appreciation or education event, which is offered to attendees without charge.
- c.) A Member, Director, Officer or employee may accept public recognition for a grant or other support provided by the Foundation, provided such recognition does not have tangible value.
- d.) A Member, Director, Officer or employee and members of his or her immediate family may accept tickets to events or other entertainment, if such individual pays for such tickets or entertainment.
- e.) While Members, Directors, Officers and employees are discouraged from accepting gifts from any potential or existing grantee, the foregoing prohibition shall not apply to a gifts of de minimis value, such as coffee mugs, candy or grantee mementos.

January 1, 2008