

Gift Policy

The European Security Transport Association (ESTA) is a signatory of the EU code of conduct of interest representatives and is registered in the EU Transparency Register under number 850612124598-41. ESTA is committed to strict compliance with all aspects of this code of conduct.

This policy comes in addition to any code of ethics or other rules of business conduct individual members may have and does not supersede them.

I. Scope of the Policy

- (a) ESTA is committed to defending the interest of its members in the most efficient and the most ethical way.
- (b) For this purpose, the present document crystallises ESTA's gift policy in relation to decision makers, industry and other stakeholders such as suppliers, elected representatives, officials, speakers invited to ESTA's conferences and any other person related to ESTA in the course of its business or activities.
- (c) This policy applies to any person when acting formally as a representative of ESTA, whether from its Secretariat, its Board Members, or its Members, whatever the instance or circumstances. It also strictly applies to sponsors and exhibitors at the ESTA conferences.

II. Purpose of the Policy

- (a) The purpose of this policy is to establish what kind of gifts can be accepted or not, and what kind of gift can be given in the course of ESTA's activities.
- (b) It applies to any gift, whether corporate holiday gifts, members' appreciation gifts, event-related gifts, marketing promotional items, conference and trade show gifts, welcome/onboarding gifts, partnership appreciation gifts.
- (c) It does not apply to private gifts under the strict circumstance that no confusion may arise from the origin of the gift.

III. Key Rules

- (a) The principle is that no gift can be accepted by anyone representing ESTA in whatever capacity.
- (b) Exceptions can be made for:
 - Gifts of symbolic or commemorative nature, provided their intrinsic value remains low. The same applies to gifts offered by ESTA/ESTA representatives to third parties in the course of the association activities.

- Long-time serving Board Member leaving the Board, who may receive a gift of higher value in recognition to their commitment to ESTA, the nature and value of which is decided by the Board under its normal decision procedures, *provided that* the leaving Board member does not accept a supervisory, regulatory or policy role of any kind of which ESTA might benefit.

IV.

Speakers at ESTA Conferences

- (a) As a matter of principle, only guest speakers may have a complimentary pass to the conference or be accommodated at ESTA's expenses.
- (b) Non-speakers may only be granted a complimentary pass if they are in no supervisory, regulatory or policy role of any kind of which ESTA might benefit.
- (c) Members of authorities of relevance to ESTA's activity, or relevant decision makers, may under no circumstances be granted a free pass to ESTA conferences unless they are speakers. They may, however, be granted the cheapest rate that any members of ESTA might be entitled to.

V.

Third Parties Events

- (a) ESTA representatives shall disclose to the ESTA Secretary General their attendance on behalf of ESTA at events organised by third parties where the reimbursement of their travel, accommodation, or subsistence expenses, or the direct payment of such expenses, is covered by a third party.
- (b) The Secretariat shall keep a central register of all gifts received or given under this policy

VI.

Reporting and Handling Violations

- (a) Any breach of this policy shall be reported to the President, the Vice Presidents and/or the Secretary general.
- (b) If necessary, ESTA will conduct thorough investigations of reported issues, with appropriate actions including warnings, membership suspensions, or exclusions.
- (c) ESTA prohibits retaliation against individuals who report compliance concerns in good faith.
- (d) In case remedies need to be brought to any situation, the Board shall decide on this in an extraordinary meeting.
- (e) Any person suspected of a breach has the right to be heard by the Board. If the suspected person participates regularly in Board meetings, they shall not take part in the decision of the Board.

VII.

Policy Review and Updates

- (a) This policy shall apply immediately upon its adoption by the Board and may be revised as and when necessary, by the Board.
- (b) It shall be displayed on ESTA's website.