

## What to Know

A gift of nominal value may be exchanged with a vendor or business associate if it is a common business courtesy, such as coffee, or a similar token — although even small gifts to government officials are prohibited under most circumstances.

As a general rule partners should limit gifts to or from any one vendor or business associate to US \$75 per year, although some areas of the business may have more strict guidelines.

A gift of money should never be given or accepted. However, during traditional gift-giving seasons in areas where it is customary to exchange gifts of money, such as in China, Japan, Singapore, Malaysia and Thailand, partners should not solicit but may exchange cash with nongovernmental business associates in nominal amounts up to the equivalent of US \$20.

If you are offered an out-of-policy gift and you cannot respectfully decline it, you may not keep it and you must disclose it to your manager. Consider with your manager possibilities such as donating the gift to charity or putting it on display in a common area.

Partners may offer or accept a meal or entertainment if it is appropriate, reasonable and customary, occurs infrequently and is not expensive.

## Ask Yourself

- What is the market value?
- Would public disclosure embarrass me or Starbucks?
- Does it violate the recipient company's policy?
- Do I feel any obligation connected with it?
- What are the intentions of giving it? Are they appropriate?



## Examples of Acceptable Gifts and Entertainment

- Fruit basket for a team
- Occasional lunch with a vendor at a reasonably priced restaurant
- Starbucks logo coffee mugs and coffee



## Examples of Unacceptable Gifts and Entertainment

- Box seat tickets to a sporting event sent to an individual
- An overnight stay at a spa resort
- US \$100 bottle of wine

## Quick Tips

Stored value cards and coupons or vouchers are considered cash. If giving a Starbucks Card, it must be only for a nominal amount.

Be familiar with Starbucks Anti-Bribery policy. (A copy of the policy may be obtained from Business Ethics and Compliance.)

A gift or favor should not be given or accepted if it might create a sense of obligation, compromise either party's professional judgment or create the appearance of doing so.

Vendors should never be solicited for donations to internal or external charity events.

*Starbucks does not tolerate retaliation against or the victimization of any partner who raises concerns or questions regarding a potential violation of Starbucks policy that he or she reasonably believes to have occurred.*



**Business Ethics  
and Compliance**

Helping Partners Live Our Values

Business Ethics and Compliance is available  
24 hours a day, seven days a week via:

Business Conduct Weblines:  
<https://BusinessConduct.EAWeblines.com>

E-mail address:  
[BusinessConduct@Starbucks.com](mailto:BusinessConduct@Starbucks.com)



## Business Ethics and Compliance

Helping Partners Live Our Values

### Business Conduct Helpline:

Australia	1-800-45-4956 or 1-800-154-867
Brazil	0800-892-1655
Canada-English	1-800-611-7792
Canada-French	1-866-614-0760
Chile	1230-020-5460
China-North	10-800-711-0718
China-South	10-800-110-0661
Costa Rica	0-800-011-0928
France	0800-91-5128
Germany	0800-182-2581
Hong Kong	800-90-8032
Netherlands	0800-022-2214
Puerto Rico	1-800-611-7792
Republic of Ireland	1-800-55-8618
Singapore	800-110-1584
Switzerland	0800-56-1170
Thailand	001-800-11-005-7967
United Kingdom	0800-028-3528
United States	1-800-611-7792

Areas that do not yet have a local Helpline number: Place a free call to the Helpline by contacting your local operator and advising you would like to place a “reverse charge” or “collect” call to the United States, number 678-250-7560. If you would like to place your call anonymously, please say “Miss Starbucks” or “Mister Starbucks” when the operator requests your name.

Be advised that calls and electronic submissions are transferred to the United States.



## Gifts and Entertainment