



# Gifts and Entertainment Policy

In this policy, you will find:

- ✓ Rules for giving and accepting Gifts and Entertainment involving potential or actual business partners

For Gifts and Entertainment involving government officials (including Foreign Officials), see the Anti-Corruption Policy.

## 1. POLICY

All business-related Gifts and Entertainment must be legal and appropriate under the circumstances. Lavish, excessive, or improper Gifts or Entertainment that could create the appearance of impropriety are prohibited.

If you give, accept, or approve a Gift or Entertainment, you must confirm that it is appropriate given the circumstances, which includes considering the value and frequency of Gifts and Entertainment involving that entity.

Key Resources	
➤	Gift or Entertainment Pre-Approval Form

## 2. APPLICABILITY

U. S. Steel Employees. This policy does not apply to Gifts and Entertainment accepted on behalf of or for the benefit of U. S. Steel.

Key Definitions	
“Entertainment”	
Business hospitalities such as drinks, meals, events, outings, sporting events (e.g., golf), or any other activities in which you participate with actual or potential business partners.	

“Gifts”
Includes any free or discounted items, services, loans, or anything else of value that is not Entertainment. If a business courtesy sounds like Entertainment (for example, tickets to a football game), but the company providing the business courtesy is not participating, it is considered a Gift.
“Foreign Official”
Includes any officer, employee, or agent of a federal, state, or other governmental entity owned or controlled by a government outside the U.S.; any employees of a company or organization that is wholly or partially owned or controlled by a non-U.S. government; employees of public international organizations; members of royal families, political parties, party officials, and candidates for political office outside the U.S. Examples include employees at public hospitals, state-run utilities, and state-supported oil and mineral companies.

## 3. ENTERTAINMENT

### a. Providing Entertainment

You may provide Entertainment to commercial, non-governmental recipients if the Entertainment is all the following:

- infrequent;
- appropriate given the recipient’s position and circumstances;
- customary industry practice;
- for a legitimate business purpose;
- permitted under applicable law;
- compliant with the Business Expense Reimbursement procedure; and,
- allowed by the recipient’s employer.

*No pre-approval is required for providing Entertainment. However, you should remember that less than \$150 per person is*



generally acceptable and between \$150-\$300 per person may be acceptable depending on the circumstances, including the participants' positions at their companies. Entertainment costing \$300 or more per person is usually acceptable only (1) in exceptional circumstances, or (2) occasionally if the recipient is a Vice President level or higher.

**b. Accepting Entertainment**

You may accept Entertainment from a non-governmental entity if it is legitimate, infrequently provided, appropriate, and you receive any required pre-approval (see Section 5 for pre-approval requirements).

**c. Entertainment Involving Spouses or Other Family**

In rare circumstances, you may provide or accept Entertainment involving recipients' family or "significant others," subject to any required pre-approval. Such Entertainment should be limited to a few times per year at most.

**4. GIFTS**

You may give and accept Gifts from a non-governmental entity if they are legitimate, infrequently provided, appropriate, accounted for according to the Business Expense Reimbursement procedure and you receive any required pre-approval.

**Valuing Gifts & Entertainment**

When assessing the value of a Gift or Entertainment, use the "sticker price," "face price," or "menu price." If the exact value is not available, make a good faith estimate. Intentionally misrepresenting the value of a Gift or Entertainment is a violation of this policy. If, after you have submitted a form, the situation materially changes, you must submit a new form.

**Prohibited Gift and Entertainment Practices**

Around the world, Gifts and Entertainment are common ways to disguise bribes, kickbacks, or other improper conduct. As such, improper or excessive Gifts or Entertainment can create an appearance of impropriety and can be seen as bribes or misuse of Company assets. To avoid such perceptions, the following practices are prohibited:

- Requesting or demanding Gifts or Entertainment of any kind
- Promising, requesting, giving, or accepting favorable treatment in exchange for any Gift or Entertainment
- Frequent Gifts or Entertainment that involve the same person or company
- Gifts or Entertainment that are unusually expensive or lavish
- Giving or accepting Gifts involving a spouse or family member
- Giving or accepting cash, gift cards, gift certificates, other cash equivalents, stocks, bonds, commissions, or similar items (this does not apply to gift certificates or gift cards that are worth \$100 or less and are won in a raffle or other random drawing)

You must also not accept a Gift from a Foreign Official (as defined in the Anti-Corruption Policy) unless (1) it is accepted on behalf of U. S. Steel and turned over to the Company, (2) it would be inappropriate to refuse, and (3) it is valued at \$100 or less.

**5. PRE-APPROVAL REQUIREMENTS**

[Click Here for a Pre-Approval Form](#)

Whether pre-approval is required depends on the value of the Gift or Entertainment. "1st Level" means approval by your supervisor. "2nd Level" means approval by your supervisor's supervisor.



# Gifts and Entertainment Policy

Required Pre-Approvals for Non-Executives			
Value Per Person	None	1st Level	2nd Level
Under \$150	<input checked="" type="checkbox"/>		
\$150-\$300		<input checked="" type="checkbox"/>	
Over \$300			<input checked="" type="checkbox"/>

Employees who do not have a 2nd Level pre-approver or whose 2nd level pre-approver would be the CEO should obtain 2nd Level pre-approval from the Controller.

Required Pre-Approvals for Executives (Vice President or Higher)		
Value Per Person	None	1st Level
\$0 - \$300	<input checked="" type="checkbox"/>	
Over \$300		<input checked="" type="checkbox"/>

The CEO should obtain 1st Level pre-approval from the Controller.

### a. When Pre-Approval is Not Possible

In the unlikely event pre-approval is required but is not possible to obtain (for example, if a Gift or invitation is unexpected), you may accept a Gift or Entertainment if it is reasonable but then must obtain approval as soon as possible. You should not use such a Gift without first obtaining approval.

## 6. OTHER REQUIREMENTS

### a. Industry / Educational Events

If a third party offers to cover the fees and expenses associated with an industry or educational event, the offer may be accepted with Executive approval. Approval will be

based on whether the participation, fees, and expenses are reasonable.

### b. Documenting Gifts & Entertainment

You must document any Gifts or Entertainment you give on behalf of U. S. Steel as required by the Business Expense Reimbursement procedure.

### c. Departmental Restrictions

Departments within U. S. Steel may institute additional requirements or limits for giving or accepting Gifts or Entertainment. If your department institutes such additional requirements, you must follow the most stringent rules that apply.

### d. Supervisor Responsibilities

Supervisors are responsible for carefully reviewing expenses that fall under this policy and exercising their discretion to determine whether such expenses comply with this policy. Supervisors should take appropriate action with employees who incur excessive expenses, especially repeatedly, including by discussing the situation with Human Resources.

### e. Getting Advice

If you face a difficult situation involving a Gift or Entertainment, you should consult your supervisor or contact the Legal Department.

## Appendices

### Related Policies and Procedures

- Anti-Corruption Policy
- Conflicts of Interest Policy
- Business Expense Reimbursement Procedure