



Global Risk, Banking and Compliance

2019 MGE Desk Reference Guide

MINIMUM STANDARDS	BENEFITS	GIVING		ACCEPTING
		SOE/GOVERNMENT OFFICIALS*	NSOE/PRIVATE INDIVIDUALS	
ALL BENEFITS TO OR FROM EXTERNAL PARTIES MUST MEET THESE MINIMUM STANDARDS: ✓ All benefits must be compliant with AEMP 06 and the Code of Conduct. ✓ Benefits may not be given/accepted to improperly influence a business decision. ✓ Benefits must comply with applicable local laws. ✓ Benefits must never be requested or solicited in exchange for an advantage. ✓ Benefits must always be appropriate, reasonable and proportionate. ✓ Benefits must be supported by a legitimate business purpose and be appropriately documented. ✓ Benefits given/accepted may not expose AMEX to unacceptable reputational risk. ✓ Benefits may not be given/accepted at an inappropriate frequency (no more than 3 times within any 6-month period). ✓ Benefits to U.S. federal state or local official employees must comply with AEMP 27. All prohibitions under the MGE Guidelines apply to the use of AMEX funds or funds from any other source, including personal funds that may be used to provide a benefit on behalf of, or for the benefit of AMEX.	MEALS & REFRESHMENTS	REFRESHMENTS UNDER \$10	\$250 AND UNDER	\$250 AND UNDER
		\$100 AND UNDER	ABOVE \$250	ABOVE \$250
		ABOVE \$100		
	GIFTS	\$250 AND UNDER	NOMINAL VALUE (\$25 AND UNDER) PERISHABLES RAFFLE WINS LIFE EVENTS \$100 AND UNDER**	NOMINAL VALUE (\$25 AND UNDER) PERISHABLES RAFFLE WINS LIFE EVENTS \$100 AND UNDER**
		ABOVE \$250 IN AGGREGATE PER CALENDAR YEAR	ALL OTHER GIFTS	ALL OTHER GIFTS
	ENTERTAINMENT	\$250 AND UNDER	ALL ENTERTAINMENT	ALL ENTERTAINMENT
		ABOVE \$250		
	EVENTS	ALL EVENTS	ALL EVENTS	ALL EVENTS
	Notes: • For other benefit types, see Section 3.3 of the MGE Guidelines. • For registration and approval requirements, see Section 3.1 of the MGE Guidelines. • Each benefit type may contain specific restrictions, see Section 3.2 of the MGE Guidelines. • For a specific exception, see Section 4 of the MGE Guidelines. • All thresholds specified are in U.S. Dollars. If you are giving or accepting a benefit in a different currency, the local equivalent applies. • For further information on the minimum standards, see Section 2 of the MGE Guidelines. *No benefits are permitted to plus ones of government officials. **Gifts for life events above \$100 require an exception.			

No Amex Entertain submission required

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Not permitted without a specific exception