



GIFTS AND ENTERTAINMENT POLICY

FEBRUARY 2021

1. Purpose

USA Archery is committed to sustaining an ethical workplace free of conflicts of interest and perceived conflicts of interest. USA Archery therefore has adopted this Gifts and Entertainment Policy to provide instruction to USA Archery employees, board members, officers, committee members, task force members, hearing panel members, and volunteers regarding how to handle offers of gifts or other forms of entertainment from individuals or companies that do business with, or are interested in doing business with, USA Archery. Additionally, it provides instruction on USA Archery extending gifts to third parties.

This policy should not be considered in any way as an encouragement to make, solicit or receive any type of gift or entertainment. Indeed, USA Archery employees, board members, officers, athlete representatives, committee members, task force members, hearing panel members, and volunteers may not, under any circumstances, actively solicit any type of gift or entertainment. Further, USA Archery will not under any circumstances permit or authorize participation in any business gifts or entertainment that might be considered lavish, inappropriate or illegal.

2. Applicability of Policy

This Gifts and Entertainment Policy is applicable to all USA Archery employees, board members officers, committee members, athlete representative, task force members, hearing panel members, contractors, and volunteers, as well as their spouses and immediate family members (“Affiliated Individuals”).

3. Receiving Business Courtesies

a. Current Business Partners

Affiliated Individuals may accept gifts from individuals and companies that currently do business with, or make donations to USA Archery as follows:

- i. Partner/sponsor/supplier products and partner/sponsor/supplier-branded products (e.g., logoed jackets) with a value of up to \$1,000 per Affiliated Individual, per year, per individual/company;
 - a. Athlete representatives may receive VIK in excess of \$1000 per partner/sponsor/supplier and may also accept contingency payments for performance or individually negotiated sponsor deals.
- ii. Other gifts with a value of no more than \$100 per Affiliated Individual, per year, per individual/company;
- iii. Invitations for the Affiliated Individual to attend sporting events with an individual/company representative including travel to and from such events only to the extent approved in advance by USA Archery's CEO.
- iv. On an infrequent basis, invitations for a spouse or family member to join the Affiliated Individual at sporting events with an individual/company representative;
- v. Invitations to attend fundraising events with an individual/company representative at no cost to the Affiliated Individual;
- vi. Invitations to attend other social, educational, or entertainment events intended to enhance the business relationship.
- vii. Perishable or consumable gifts provided that the gift is reasonable and not unduly lavish.

b. Prospective Business Partners

Affiliated Individuals may accept gifts from individuals and companies that are not current business partners of USA Archery but that may or may not be seeking to engage in a business relationship with USA Archery as follows:

- i. Gifts with a value of not more than \$100 per Affiliated Individual, per year, per individual/per company;

- ii. Invitations for the Affiliated Individual to attend sporting events with an individual/company representative (but not travel to and from such events);
- iii. Invitations to attend fundraising events with an individual/company representative;
- iv. Invitations to attend other social, educational or entertainment events intended to promote the business relationship provided that the cost of the event does not exceed \$600 per Affiliated Individual, per event and \$1000 total per Affiliated Individual, per individual/company, per year.

c. Limitations

Affiliated Individuals may never accept cash or financial instruments, such as checks or stocks. Under the guidelines set forth herein, Affiliated Individuals may accept gift certificates or gift cards.

4. Disclosure and Approval

All gifts or invitations falling under Section 3(A)(1), Section 3(A)(3), and Section 3(B)(2) above, and all invitations that involve the third party paying for the Affiliated Individual's travel and/or overnight accommodations, must be promptly reported to the CEO. Where the gift or invitation is made to the CEO, the requisite disclosure must be made to the USAA Board Chair. Prior to accepting invitations or gifts that include travel and/or overnight accommodations during business hours, written approval must be received from the CEO. In the case of the CEO's request for approval, such approval must be received from the USAA Board Chair.

Any potential gifts or invitations extended that exceed the limits and/or parameters noted above must be disclosed to, and approved in advance and in writing by the CEO, as appropriate, before they may be accepted.

5. Extending Business Courtesies

General Rules

There may be times when an Affiliated Individual wishes, as a business matter, to extend to a current or potential USA Archery business associate (i.e., an individual or company) a gift or an invitation to attend a social event (e.g., reception, meal, sporting event, or theatrical event) to further or develop a business relationship. If the event or business matter is not already approved by the CEO, the gifts may not exceed \$100 in value per person per year. Invitations to events must be reasonable and appropriate. Topics of a business nature must be discussed at the event, and the USA Archery employee or Board Member must be present. Moreover, such business entertainment with respect to any particular individual must be infrequent, which, as a general rule, means not more than four (4) times per year. Frequency beyond the foregoing must be pre-approved in writing by the CEO. To the extent the USA Archery employee or Board Member has knowledge

of applicable restrictions by a recipient's organization on gifts and entertainment, the USA Archery employee or Board Member must undertake best efforts for all business entertainment and gifts to comport with the restrictions imposed by the recipient's organization.

a. Development Division/Staff

USA Archery recognizes that the limits set forth in Section 5 may hamper the ability of the Fundraising/Sponsor/Event Staff to perform their job functions. In light of this, the limits will not apply to those staff if the invitation or event is part of normal and reasonable job duties and the event is not lavish or unreasonable.

c. Disclosure And Approval

All gifts or invitations offered by an Affiliated Individual must be covered by the appropriate USA Archery budget and must be approved in advance by the appropriate USA Archery supervisor. All gifts or invitations extended that exceed the limits and/or parameters noted above must be disclosed to, and approved in advance and in writing by, the CEO before they may be offered.

d. USA Archery Point of Contact

Affiliated persons in need of further information or guidance in relation to this policy should contact the Chief Executive Officer of USA Archery at ceo@usarchery.org or the USAA Board Chair at ethics@usarchery.org.