



GIFTS AND ENTERTAINMENT POLICY

PURPOSE

U.S. Figure Skating is committed to sustaining an ethical workplace and community free of conflicts of interest and perceived conflicts of interest. U.S. Figure Skating has adopted this Gifts and Entertainment Policy serves to provide instruction to the U.S. Figure Skating employees, Board of Directors, officers, committee members, task force members, hearing panel members, contractors, officials, volunteers, and by extension, their immediate family members (Covered Individuals) regarding how to handle offers of gifts of other forms of entertainment from individuals or companies that do business with, or are interested in doing business with, U.S. Figure Skating.

This policy should not be considered in any way as an encouragement to make, solicit, or receive any type of gift or entertainment. Covered Individuals may not, under any circumstances, actively solicit any type of gift or entertainment. Further, U.S. Figure Skating will not under any circumstances permit or authorize participation in any business gifts or entertainment that might be considered lavish, inappropriate, or illegal.

APPLICABILITY of POLICY

The Gifts and Entertainment Policy is applicable to all U.S. Figure Skating employees, Board of Directors, officers, committee members, task force members, hearing panel members, contractors, officials, volunteers, and by extension, their immediate family members (Covered Individuals).

NON-GIFTS

The following items/scenarios do not constitute a reportable gift or entertainment under this policy:

1. Promotional items that are provided to all attendees at an event or items of nominal value (less than \$25 retail value).
2. A gift provided or invitation extended by an individual based on personal friendship; individuals subject to this policy must be mindful of gifts and invitations based on friendship as opposed to gifts and invitations provided based on one's role with U.S. Figure Skating.
3. An item that may be publicly displayed or shared such as flowers, cookies, etc.
4. Food and/or beverage provided as meal or refreshment at a business meeting or reception attended by a Covered Individual as part of their official responsibilities.

RECEIVING BUSINESS COURTESIES

A. Current Business Partners

Covered Individuals may accept gifts from individuals and companies that currently do business with, or make donations to, U.S. Figure Skating as follows:

1. Partner/sponsor/supplier products and partner/sponsor/supplier-branded products (i.e., logoed jackets) with a total value of under \$1,000 per person, per year, per individual/company.
2. Other gifts with a value of no more than \$500 per person, per year, per individual/company.
3. Invitations for the Covered Individual to attend sporting/entertainment events with an individual/company representative (including travel to and from such events) require advance approval by:
 - a) For employees, by the Chief Executive Officer or General Counsel
 - b) For the Board of Directors, by the President or Administrative/Legal Group Coordinator
 - c) For a committee representative, by the Chair of the Ethics Committee
4. On an infrequent basis, invitations for a spouse or family member to join the Covered Individual at events with an individual/company representative, pending advance approval above.
5. Invitations to attend fundraising events with an individual/company representative at no cost to the Covered Individual.
6. Invitations to attend other social, educational, or entertainment events intended to enhance the business relationship, provided that the cost does not exceed \$500 per Covered Individual per event and \$1,000 total per individual/company per year; and
7. Perishable or consumable gifts provided that the gift is reasonable and not unduly lavish.

B. Prospective Business Partners

Covered individuals may accept gifts from individuals and companies that are not current business partners of U.S. Figure Skating, but that may or may not be seeking to engage in a business relationship with U.S. Figure Skating as follows:

1. Gifts with a value of not more than \$500 per Covered Individual, per year, per individual/company.
2. Invitations for Covered Individuals to attend sporting/entertainment events with an individual/company representative (without travel to and from such event).
3. Invitations to attend fundraising events with a Prospective Business Partner representative (without travel to and from such event).

4. Invitations to attend other social, educational or entertainment events intended to promote the possible business relationship, provide that the cost of the event does not exceed \$500 per Covered Individual per event, and \$1,000 total per Covered Individual per individual/company per year.

Covered Individuals may accept gift cards/certificates within the limits set forth in this policy but may never accept cash or financial instruments (i.e., checks, stocks) from a Current or Prospective Partner.

C. International Events

Covered Individuals who receive gifts from international federations, event organizing committees, etc., in connection with their official duties, more than the limits outlined in this policy must disclose those gifts, as outlined below. This excludes cash stipends or gifts provided to international event officials in accordance with standard ISU rules/communications.

- a) For employees, to the General Counsel
- b) For the Board of Directors, to the President or Administrative / Legal Group Coordinator
- c) For officials, coaches, or athletes to the Chair of the Ethics Committee

DISCLOSURE AND APPROVAL – RECEIVING

All invitations that exceed the above limits, and all invitations that involve the third party paying for the Covered Individual's travel and/or overnight accommodations, must be promptly reported to the individuals below for approval prior to acceptance:

- a) For employees, the Chief Executive Officer or General Counsel
- b) For the Board of Directors, the President or Administrative / Legal Group Coordinator
- c) For all others, the Chair of the Ethics Committee

Where the gift or invitation is to the Chair of the Ethics Committee, the requisite disclosure must be made to the Administrative/Legal Group Coordinator. Where the gift or invitation is to the President, Executive Officer or General Counsel, the request for approval must be received from the Ethics Committee.

In addition, the approving individual(s), in consultation with the Covered Individual, shall have the right to require that any gift(s) be returned or donated to U.S. Figure Skating if it is believed that such gift(s) is not proper and/or creates an appearance of impropriety.

EXTENDING BUSINESS COURTESIES

A. General Rules

There may be times when a U.S. Figure Skating employee or Board member wishes, as a business matter, to extend a current or potential U.S. Figure Skating business associate (i.e., an individual or company) a gift or invitation to attend a social event (e.g., a reception, meal, or U.S. Figure Skating event) to further develop a business relationship. Additionally, there may be times when a current or potential U.S. Figure Skating business associate (i.e., an individual or company) wishes, as a business matter, to extend a U.S. Figure Skating Board member a gift or an invitation to attend a social event

(e.g., reception, meal, sporting event) to further develop a business relationship. In such instances, gifts may not exceed \$500 in value per person per year.

An exception to this is in the case where the gift is a ticket, from an employee or Board member to an associate, to attend an official figure skating event organized and hosted by U.S. Figure Skating (e.g., U.S. Figure Skating Championships, Skate America or an ISU event hosted by U.S. Figure Skating). In this case, the event ticket(s) should be distributed through appropriate and transparent channels.

Invitations to events must be reasonable and appropriate. Topics of a business nature must be discussed at the event, and the U.S. Figure Skating employee or Board member must be present. The cost associated with such an event should not exceed \$500 per person/company per year, except with regard to fundraising functions and events organized and hosted by U.S. Figure Skating, without the prior written approval of the General Counsel, Chief Executive Officer, and/or President. To the extent that the U.S. Figure Skating Board member or employee has knowledge of applicable restrictions by a recipient's organization on gifts and entertainment, the U.S. Figure Skating Board member or employee must undertake best efforts for all business entertainment and gifts to comport with the restrictions imposed by the recipient's organization.

U.S. Figure Skating Board members or employees may give gift certificates/cards within the limits set forth in this policy, but may never give cash or financial instruments, such as checks or stocks.

B. Development Department Staff

U.S. Figure Skating recognizes that the limits set forth above may hamper the ability of the Development Department to perform their job functions. In light of this, the foregoing limits will not apply to Development Department staff if the invitation or event is part of normal and reasonable job duties and the event is not lavish or unreasonable. For the Development Department, the cost of gifts and events for which no prior written approval is required is \$1,000 per person per year. To the extent any gift or invitation exceeds that limitation, prior written approval must be obtained from the General Counsel and/or Chief Executive Officer.

C. Government Employees

The giving of gifts to federal, state, and local government employees is governed by a complex set of rules that is typically agency-specific. Generally, the giving of gifts to government employees is very limited or prohibited. Before offering a gift to a government employee, of any value, employees and Board members must receive the approval of the General Counsel in advance and in writing.

DISCLOSURE AND APPROVAL – GIVING

All gifts or invitations offered by a Covered Individual must be covered by the appropriate U.S. Figure Skating budget and must be approved in advance by the appropriate U.S. Figure Skating supervisor. All gifts or invitations extended that exceed the limits and/or parameters noted above must be disclosed to, and approved of in advance and in writing by:

- a) For employees, the Chief Executive Officer or General Counsel
- b) For the Board of Directors, the President or Administrative/Legal Group Coordinator
- c) For all others, the Chair of the Ethics Committee

RESPONSIBILITY / POINT OF CONTACT

Covered Individuals that need further information or guidance in relation to this policy should contact the Legal / SkateSafe Department at: skatesafe@usfigureskating.org