



**GIFTS AND ENTERTAINMENT POLICY
OF
USA SHOOTING**

Effective: April 8, 2024

1. Purpose

USA Shooting (“USAS”) is committed to sustaining an ethical workplace free of conflicts of interest and perceived conflicts of interest. USAS therefore has adopted this Gifts and Entertainment Policy to provide instruction to USAS 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, USAS. Additionally, it provides instruction on USAS 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, USAS employees, board members, officers, committee members, task force members, hearing panel members, and volunteers may not, under any circumstances, actively solicit any type of gift or entertainment.** Further, USAS will not under any circumstances permit or authorize participation in any business gifts or entertainment that might be considered lavish, inappropriate or illegal. The only permitted gifts or entertainment are those outlined in this policy, and those gifts or entertainment must be properly disclosed.

2. Applicability of Policy

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

3. Non-Gifts

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

- a) Any item or event which is available to the general public and the Affiliated Individual pays fair market value for;



- b) Promotional items that are provided to all attendees at an event or items of nominal value (less than \$25.00 retail value);
- c) A gift or invitation extended by a relative or provided by an individual on the basis of 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 USAS;
- d) An item which may be publicly displayed or shared among USAS employees, such as flowers or cookies; or
- e) Food and/or beverage provided as meal or refreshment at a business meeting or reception attended by an Affiliated Individual as part of their official responsibilities, provided such food and/or beverage is reasonable for the event.

4. 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 USAS 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;
- 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
 - a. Travel to and from such events may only be accepted to the extent approved in advance by USAS Ethics Committee.
- 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;
 - a. Travel to and from such events for the spouse or family member may only be accepted to the extent approved in advance by USAS's Ethics Committee.



- 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, provided that the cost of the event does not exceed \$100 per Affiliated Individual, per event and \$400 total per Affiliated Individual per company, per year; and
- 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 USAS but that may or may not be seeking to engage in a business relationship with USAS 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 \$100 per Affiliated Individual, per event and \$200 total per Affiliated Individual, per individual/company, per year.

c. Limitations

Affiliated Individuals may accept gift certificates within the limits set forth in this policy, but may never accept cash or financial instruments, such as checks or stocks, in any amount from any source.

d. Disclosure and Approval

Affiliated Individuals must promptly disclose any and all gifts or invitations received in their capacity as an employee or representative of USAS to the CEO or the CEO's designee.



To obtain approval please use the disclosure form attached to this policy and submit it to giftsreporting@usashooting.org. Where the gift or invitation is made to the CEO, the disclosure form must be made to the Ethics Committee at Ethics@usashooting.org.

Prior to accepting invitations or gifts that include travel and/or overnight accommodations, written approval must be received from the CEO or the CEO's designee. In the case of the CEO's request for approval, such approval must be received from the Ethics Committee.

In the event that an Affiliated Individual receives a gift that exceeds the permissible limits, but is concerned that returning the gift may appear discourteous or it is not reasonably possible to refuse the acceptance of the gift (e.g., an anonymous gift, a gift being delivered by a third-party courier to the Affiliated Individual's office), the Affiliated Individual must provide the gift to the CEO or CEO's designee. The receipt of these surrendered gifts, which will be donated to USAS or another designated charity, will be logged by CEO or the CEO's designee.

The Ethics Committee and CEO or the CEO's designee may, in consultation with the Affiliated Individual, to require that any gift(s) be surrendered and donated to USAS or another agreed-upon charity if the Ethics Committee or CEO or the CEO's designee believes that such gift(s) is not proper and/or creates an appearance of impropriety.

5. Extending Business Courtesies

a. Current or Prospective Business Partners

There may be times when an Affiliated Individual wishes to extend 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.

In such instances, gifts may not exceed \$100 in value per person, per year, without the prior written approval of the CEO or the CEO's designee and/or the Ethics Committee.

Invitations to events must be reasonable and appropriate. Topics of a business nature must be discussed at the event, and the Affiliated Individual must be present. The cost associated with such an event should not exceed \$100 per person/company per year, except with regard to sporting events and fundraising functions, without the prior written approval of the CEO or the CEO's designee. 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 calendar year. Any business entertainment in excess of this standard must be approved in writing by the CEO or the CEO's designee.



All such gifting and business entertainment must comport with the code of conduct or code of ethics of the recipient's organization.

USAS employees or Board members may give gift certificates within the limits set forth in this policy, but may never give cash or financial instruments, such as checks or stocks.

b. 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, you must receive the approval of the CEO or the CEO's designee in advance and in writing.

c. Disclosure And Approval

All gifts or invitations offered by an Affiliated Individual must be covered by the appropriate USAS budget and must be approved in advance by the appropriate USAS supervisor.

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 or the CEO's designee before they may be offered.

To obtain approval please fill out the disclosure form attached to this policy and submit it to giftsreporting@usashooting.org.

6. Policy Violations

Violations of this policy may be reported to USAS by the processes outlined in the **USAS Whistleblower and Anti-Retaliation Policy**. Violations will be referred to CEO or the CEO's designee or Ethics Committee and subject to appropriate disciplinary action, up to and including termination of employment.

7. USAS Point of Contact

If an Affiliated Individual is unsure of any of the requirements set forth in this policy or has questions regarding a specific situation related to gifts and entertainment, they should contact the CEO or the CEO's designee.



USAS GIFT DISCLOSURE FORM

Please complete this form immediately upon receipt of gifts¹ received in your capacity as an employee or representative of USAS.

Name: _____

- USAS Employee USAS Board Member USAS Volunteer
- USAS Committee Member USAS Hearing Panel Member
- USAS Task Force Member Athlete Representative
- Contractor
- Other (please specify): _____

Describe the gift(s) received:

- The value of the gift is estimated at \$_____. Note: This is a good faith estimate based on retail value. If the value cannot reasonably be estimated or determined, so state.
- Please describe the source of the gift (name and relationship to USAS) and under what circumstances it was received:
 - Current business partner: _____
 - Prospective business partner: _____
 - Other: _____
- Indicate below any matters pending or likely to arise in the future that might involve the donor: _____

Certification: I certify that this gift was not solicited.

¹ USAS defines personal gifts as items of value provided by individuals and/or organizations with present or prospective business relationships with USAS. See USAS Gift and Entertainment Policy for exceptions to this definition.



SIGNATURE: _____

DATE: _____

Send this completed form to the CEO or the CEO's designee:
CEO@usashooting.org