



Policy Name: Gifts and Entertainment Policy

Date of Issuance: 3/29/2022 **Policy Owner:**

General Counsel

Applies to: USA Volleyball Employees, USA Volleyball Board of Directors, Officers, and Committee Members, USA Volleyball Contractors (the "USAV Organization")

Purpose:

To guide the USAV Organization regarding how to handle gift/courtesies situations

Policy Statement:

From time to time, in the course of work or association with USA Volleyball, a USAV Organization individual may be offered a gift or invitation to a sporting event or other form of entertainment from individuals or companies that do business with, or are interested in doing business with, USA Volleyball. Additionally, there may be times where it is in USA Volleyball's interest for a USAV Organization individual to offer a gift or invitation to an event to a third party.

This policy should not be considered in any way as an encouragement to make, solicit or receive any type of entertainment or gift. Indeed, those with the USAV Organization may not, under any circumstances, actively solicit any type of entertainment or gift. Further, USA Volleyball will not, under any circumstances, permit or authorize participation in any business gifts or entertainment that might be considered lavish, inappropriate or illegal.

For the avoidance of doubt, this policy also applies to gifts and invitations to spouses and immediate family members of those with the USAV Organization. Anyone with the USAV Organization having questions or concerns about the giving or receiving of a gift should discuss that concern or question with USA Volleyball General Counsel.

Receiving Business Courtesies

General Rules:

I. Current Business Partners: USAV Organization may accept gifts from individuals and companies that currently do business with USA Volleyball as follows: (a) partner/sponsor/supplier products and partner/sponsor/supplier-branded products (e.g., logoed jackets) with a value of up to \$1,000 per USAV Organization individual per year, per individual/company; (b) other gifts with a value of not more than \$200 per USAV Organization individual, per year, per individual/company; (c) invitations for USAV Organization 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 USAV General Counsel); (d) on an infrequent basis, invitations for a spouse or family member to join the USAV Organization individual at a sporting event with an individual/company representative; (e) invitations to attend fundraising events with an individual/company representative at no cost to the USAV Organization individual; (f) 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 USAV Organization individual per event and \$400 total per individual/company per year; and (g) perishable or consumable gifts provided that the gift is reasonable and not unduly lavish.

II. Prospective Business Partners: USAV Organization individuals may accept gifts from individuals and companies that are not current business partners of USA Volleyball, but that may or may not be seeking to engage in a business relationship with USA Volleyball as follows: (a) gifts with a value of not more than \$50 per USAV Organization individual, per year, per individual/company; (b) invitations for the USAV Organization individual to attend sporting events with an individual/company representative (but not travel to and from such events); (c) invitations to attend fundraising events with an individual/company representative; (d) invitations to attend other social, educational or entertainment events intended to promote the possible business relationship, provided that the cost of the event does not exceed \$50 per USAV Organization individual per event and \$100 total per USAV Organization individual per individual/company per year. USAV Organization individuals may accept gift certificates within the limits set forth in this policy but may never accept cash or financial instruments (e.g., checks, stocks).

Disclosure and approval:

All gifts or invitations falling under section I(a), I(c) and II(b) above and all invitations that involve the third party paying for the USAV Organization individual's travel and/or overnight accommodations must be promptly reported to USA Volleyball General Counsel. Prior to accepting invitations to opportunities that include travel and overnight accommodations during business hours, written approval must be received, if regarding a USA Volleyball employee from the USA Volleyball employee's supervisor and USA Volleyball General Counsel, and for all others, approval must be received from USA Volleyball General Counsel.

Any potential gifts or invitations extended that exceed the limits and/or parameters noted above must be disclosed to and approved in advance by USA Volleyball General Counsel before they may be accepted.

In addition, USA Volleyball General Counsel shall have the right, in consultation with the effected USAV Organization individual, to require that any gift(s) be donated to USA Volleyball or an agreed upon charity if USA Volleyball General Counsel believes that such gift(s) is not proper and/or creates an appearance of impropriety.

The Gift Disclosure form is attached hereto.

Extending Business Courtesies

General rules:

There may be times when a USAV Organization individual wishes, as a business matter, to extend to a current or potential USA Volleyball 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.

In such instances gifts may not exceed \$50 per person per year, without the prior written approval of the USA Volleyball CEO and USA Volleyball General Counsel.

Invitations to events must be reasonable and appropriate. Topics of a business nature must be discussed at the event. The cost associated with such an event should not exceed \$100.00 per person/company per year, except with regard to sporting events and fundraising functions, without the prior written approval of the USA Volleyball CEO and USA Volleyball General Counsel. Moreover, such business entertainment with respect to any particular individual must be infrequent, which, as a general rule, means not more than four times per year. Frequency beyond the foregoing must be approved in writing by the USA Volleyball CEO and USA Volleyball General Counsel. All such business entertainment must comport with the code of conduct or code of ethics of the recipient's organization.

USAV Organization individuals may give gift certificates within the limits set forth in this policy but may never give cash or financial instruments (e.g., checks, stocks).

Government Employees:

The giving of gifts to federal, state and local government employees is governed by a complex set of rules that are typically agency specific. Generally, the giving of gifts to government employees is very limited or prohibited. Before offering a gift to a government employee, you must receive the approval of USA Volleyball General Counsel.

Disclosure and approval:

All gifts or invitations must be covered by the appropriate USA Volleyball budget and must be approved in advance by the applicable USA Volleyball supervisor.

Any potential gifts or invitations extended that exceed the limits and/or parameters noted above must be disclosed to and approved in advance by the USA Volleyball CEO and USA Volleyball General Counsel before they may be offered.