

## Policy Title | Gifts and Entertainment

### Purpose & Scope

USA Climbing is committed to sustaining an ethical workplace free of conflicts of interest and perceived conflicts of interest. USA Climbing therefore has adopted this Gifts & Entertainment Policy to provide instruction to USA Climbing's Affiliated Individuals, as defined below under "Applicability of Policy," 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 Climbing. Additionally, it provides instruction on USA Climbing extending gifts to third parties.

This policy should not be considered an encouragement to make, solicit, or receive any gift or entertainment. USA Climbing Affiliated Individuals may not, under any circumstances, actively solicit any gift or entertainment in the context of their role with USA Climbing. Further, USA Climbing will not permit or authorize participation in any business gifts or entertainment considered lavish, inappropriate, or illegal. The only allowed gifts or entertainment are those outlined in this policy, and those gifts or entertainment outside of the guidelines set forth herein must be promptly and properly disclosed. Affiliated Individuals with questions or concerns about giving or receiving a gift or entertainment should discuss their concern or question with the Director of Finance and Administration.

### Policy Statement

#### Applicability of Policy

This Gifts and Entertainment Policy applies to all USA Climbing employees, board members, officers, committee members, task force members, hearing panel members, contractors, volunteers, and their spouses and immediate family members ("Affiliated Individuals").

#### Gifts Received

Affiliated Individuals may accept and are not required to disclose gifts, entertainment, invitations to attend events, or travel benefits valued at less than \$250 (see below for further information regarding gift limits from Prospective Business Partners). Other non-gifts that may be accepted by Affiliated Individuals without disclosure include:

- a. Sponsor discounts and provided products (up to the limits provided in 3.1.a below);
- b. Any item or event which is available to the general public and for which the Affiliated Individual pays fair market value;
- c. Promotional items provided to all attendees at an event;
- d. A gift or invitation extended by a relative or provided 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 USA Climbing;
- e. An item that may be publicly displayed or shared among USA Climbing employees or volunteers, such as flowers or cookies; or

- f. Food and 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 beverage is reasonable for the event.

Any gifts, entertainment, invitations, or travel benefits valued at \$250 or more must be disclosed promptly to USA Climbing's Director of Finance and Administration unless specifically mentioned herein. Where the gift, invitation, or benefit is made to the President & CEO or the Director of Finance and Administration, the required disclosure must be made to the Ethics Committee.

Affiliated Individuals may never accept cash or financial instruments, such as checks or stocks. Affiliated Individuals may accept gift certificates or gift cards, provided that they comply with the guidelines set forth herein.

The Director of Finance and Administration, in consultation with the Affiliated Individual, may require that any gift(s) be surrendered, refused, and/or donated to the USA Climbing Foundation or another agreed-upon charity if the Director of Finance and Administration believes that such gift(s) is not proper or creates an appearance of impropriety. At their discretion, the Director of Finance and Administration may consult with the Ethics Committee in reaching a decision and/or transfer this decision making responsibility to the Ethics Committee.

### **Current USA Climbing Business Partners**

A Current Business Partner is defined as any individual or organization with whom USA Climbing has a contractual arrangement or had one sometime within the previous 12 months. This includes, but is not limited to, those who host events, vendors who supply products or services to a National Team, and USA Climbing sponsors.

Affiliated Individuals may accept gifts, entertainment, or other benefits from a Current Business Partner without disclosure under the following conditions:

- a. A Current Business Partner's products or branded products (e.g., logoed jackets) with a value up to \$500 per Affiliated Individual, per year, per Business Partner.
- b. All invitations to events (ie. sporting, fundraising, social, educational, or entertainment events), including associated travel costs to and from such events, with a Business Partner representative intended to enhance the business relationship with a value up to \$500 per Affiliated Individual, per year, per Business Partner. Affiliated Individuals receiving invitations where the value exceeds \$500 must seek prior approval from the Director of Finance and Administration. At their discretion, the Director of Finance and Administration may consult with the Ethics Committee in reaching a decision and/or transfer this decision making responsibility to the Ethics Committee.
- c. Cost of business development meetings with a Current Business Partner, including associated travel costs to and from the meeting, provided that all costs are reasonable and without undue extravagance.
- d. Complimentary climbing gym memberships provided to all National Team members and/or all USA Climbing employees.

### **Prospective Business Partners**

Affiliated Individuals may accept gifts from individuals and companies who are not Current Business Partners of USA Climbing, who are actively seeking to engage in a business relationship with USA Climbing (“Prospective Business Partner”) without disclosure under the following conditions:

- a. Gifts with a value less than \$100 per Affiliated Individual, per year, per Prospective Business Partner;
- b. All invitations to events (ie. sporting, fundraising, social, educational, or entertainment events), excluding associated travel costs to and from such events, with a Prospective Business Partner representative intended to enhance the business relationship, up to \$100 per Affiliated Individual, per year, per Prospective Business Partner.
- c. Cost of business development meetings with a Prospective Business Partner, including associated travel costs to and from the meeting, provided that all costs are reasonable and without undue extravagance.

### **Anonymous Gifts**

Affiliated Individuals may not accept anonymous gifts that are sent to them in their official capacity.

### **Gifts Given**

There may be times when an Affiliated Individual, on behalf of USA Climbing, wishes to extend to a current or prospective USA Climbing business partner (i.e., an individual or company) a gift or an invitation to attend an event (i.e., reception, meal, or sporting event) to further or develop a business relationship. In such instances, gifts may not exceed \$500 in value per person per year, unless the Director of Finance and Administration gives prior written approval. At their discretion, the Director of Finance and Administration may consult with the Ethics Committee in reaching a decision and/or transfer this decision making responsibility to the Ethics Committee. For the avoidance of doubt, events and gifts valued at less than \$500 do not need explicit approval. Invitations to events must be reasonable and appropriate. Topics of a business nature must be discussed at the event, and the inviting Affiliated Individual must be present.

All gifts or invitations offered by an Affiliated Individual must be assigned to the appropriate USA Climbing budget and approved in advance by the appropriate USA Climbing employee.

### **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, of any value, an Affiliated Individual must receive the approval of either the Director of Finance and Administration (for USA Climbing employees other than the President & CEO) or the Ethics Committee (for all other Affiliated Individuals) in advance and in writing.

## Procedures

### **Disclosure by Affiliated Individuals**

Upon receiving (or being notified that that will be receiving) any gifts, invitations, or other benefits whose value exceeds the limits outlined in the policy above, Affiliated Individuals must notify USA Climbing’s Director of Finance and Administration in writing. Where the gift, invitation, or benefit is made to the President & CEO or the Director of Finance and Administration, that disclosure must be made to the Ethics Committee.

The disclosure must include the name of the organization or individual providing the gift, invitation, or benefit, the circumstances under which it is being given, and any information about its actual or estimated value.

The Director of Finance and Administration or, if appropriate, the Chairperson of the Ethics Committee will make a determination as to the allowability of the gift, invitation, or benefit and communicate that decision to the relevant Affiliated Individual.

If an Affiliated Individual is unsure of any of the requirements outlined in this policy or has questions regarding a specific situation related to gifts and entertainment, they should contact the Director of Finance and Administration.

### **Reporting of Suspected Violations**

Possible violations of this policy may be reported to USA Climbing by the processes outlined in the USA Climbing Whistleblower Policy. Such reports will be referred to the Ethics Committee for investigation. Individuals found to be in violation of this policy are subject to appropriate disciplinary action, up to and including termination of employment or Board/committee membership.

## Approvals/Dates

<b>Approved</b>	July 17, 2024
<b>Effective</b>	July 17, 2024

## Revision History

<b>Date</b>	<b>Changes</b>
July 17, 2024	Initial version

## Policy Owner

Governance Committee Chair – [governance@usacimbing.org](mailto:governance@usacimbing.org)