



**GIFTS AND ENTERTAINMENT POLICY  
EFFECTIVE DATE: SEPTEMBER 1, 2021**

**1. Purpose**

USA Wrestling (“USAW”) is committed to sustaining an ethical workplace free of conflicts of interest and perceived conflicts of interest. USAW therefore has adopted this Gifts and Entertainment Policy to provide instruction to USAW 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, USAW. Additionally, it provides instruction on USAW 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, USAW 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, USAW 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 USAW 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. 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 USAW 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 including travel to and from such events only to the extent approved in advance by USAW's Ethics & Membership 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;
- 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 individual/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 USAW but that may or may not be seeking to engage in a business relationship with USAW 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 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 Ethics & Membership Committee and General Counsel. Where the gift or invitation is made to the General Counsel, the requisite disclosure must be made to the Ethics & Membership Committee. Prior to accepting invitations or gifts that include travel and/or overnight accommodations during business hours, written approval must be received from the General Counsel. In the case of the General Counsel's or CEO's request for approval, such approval must be received from the Ethics & Membership Committee.

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 Ethics & Membership Committee or General Counsel, as appropriate, before they may be accepted.

In addition, the Ethics & Membership Committee and General Counsel may, in consultation with the Affiliated Individual, to require that any gift(s) be returned, donated to USAW, or donated to another agreed-upon charity if the Ethics & Membership Committee or General Counsel believes that such gift(s) is not proper and/or creates an appearance of impropriety.

The Gift Disclosure form is attached.

#### **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 USAW 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 \$100 in value per person per year, without the prior written approval of the General Counsel and/or the Ethics & Membership Committee.

Invitations to events must be reasonable and appropriate. Topics of a business nature must be discussed at the event, and the USAW employee or Board Member 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 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 (4) times per year. Frequency beyond the foregoing must be pre-approved in writing by the General Counsel. To the extent the USAW employee or Board Member has knowledge of applicable restrictions by a recipient's organization on gifts and entertainment, the USAW 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.

USAW 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.

a. Development Division/Staff

USAW recognizes that the limits set forth in Section 5 may hamper the ability of the Development Division/Development Staff to perform their job functions. In light of this, the foregoing limits will not apply to the Development Division/Development 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 Division/Development Staff only, the cost of gifts and events for which no prior written approval is required is \$600 per person per year. To the extent any gift or invitation exceeds that limitation, the USAW Development employees/staff must obtain the prior written approval from the Counsel.

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 General Counsel in advance and in writing.

c. Disclosure And Approval

All gifts or invitations offered by an Affiliated Individual must be covered by the appropriate USAW budget and must be approved in advance by the appropriate USAW 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 General Counsel before they may be offered.

d. USAW Point of Contact

Affiliated persons in need of further information or guidance in relation to this policy should contact the General Counsel.

USAW GIFT DISCLOSURE FORM

Please complete this form immediately upon receipt of personal gifts<sup>1</sup> received in your capacity as an employee or representative of USAW.

Name: \_\_\_\_\_

USAW Employee                       USAW Board Member                       USAW Volunteer

USAW Committee Member                       USAW Hearing Panel Member

USAW 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 USAW) 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: \_\_\_\_\_

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

<sup>1</sup> USAW defines personal gifts as items of value provided by individuals and/or organizations with present or prospective business relationships with USAW. Excluded from disclosure are promotional gifts of nominal value (less than \$50 retail value) such as coffee mugs, hats, pins, etc.

Certification: I certify that this gift was not solicited.

SIGNATURE: \_\_\_\_\_

DATE: \_\_\_\_\_

Send this completed form to Laura Peeters, USA Wrestling General Counsel at [lpeeters@usawrestling.org](mailto:lpeeters@usawrestling.org).