



## **Gifts and Entertainment Policy**

## 1. Introduction

The purpose of the USA Triathlon (“USAT”) Gifts and Entertainment Policy is to provide guidance to employees, board of directors and officers, committee members, task force members, hearing panel members, volunteers, contractors, spouses and immediate family members of the foregoing (collectively, “USAT Affiliated Individuals”) regarding gifts and entertainment. Specifically, this Policy applies to circumstances where companies that do business with, or are interested in doing business with USAT, offer a gift or invitation to an event that exceeds \$250 in value. This Policy also applies to USAT Affiliated Individuals who give gifts or entertainment as part of doing business on behalf of USAT.

This Policy should not be interpreted as encouraging USAT Affiliated Individuals to solicit any type of entertainment or gift; in fact, USAT Affiliated Individuals may **not** actively solicit gifts or entertainment opportunities. If any USAT Affiliated Individual has any questions or concerns about receiving gifts or accepting invitations to events, please contact the USAT Senior Counsel or the USAT Chief Financial Officer.

## 2. Gift Thresholds and Disclosure Requirements

- All USAT Affiliated Individuals may keep and are not required to report gifts (whether given or received) valued at less than \$250 (valued at manufacturer’s cost)
- Sponsor discounts and provided products are not considered gifts
- USAT Affiliated Individuals should never give or receive cash or gift cards
- If a USAT Affiliated Individual receives a gift and would like to keep it, they should pay the giver the manufacturer’s cost value of the item minus \$250
- Any gift, whether given or received, valued at \$250 (manufacturer’s cost) and over should be disclosed to the Senior Counsel by completing the disclosure form located on Namely

## 3. Entertainment and Travel Benefits

- Any tickets to entertainment/sporting events valued at \$250 and above should be disclosed to the Senior Counsel by completing the disclosure form
- The USAT Affiliated Individual may keep the tickets if the value is less than \$250
- Any employee travel/accommodations paid by a third party should be disclosed to Senior Counsel and approved prior to travel

## 4. Reporting

If an Affiliated Individual must disclose any entertainment or gift based on the foregoing, they

should email the USA Triathlon legal team ([legal@usatriathlon.org](mailto:legal@usatriathlon.org)) or Senior Counsel ([nellie.viner@usatriathlon.org](mailto:nellie.viner@usatriathlon.org)) including a description of the item or entertainment, its value, the pertinent dates and parties involved.

## 5. **Summary**

Generally, receiving gifts and invitations are limited by the above rules. If a USAT Affiliated Individual has any questions or concerns, they may contact the Senior Counsel or Chief Financial Officer, who are responsible for this policy and its enforcement:

**Nellie Viner**, USAT Senior Counsel  
[Nellie.Viner@usatriathlon.org](mailto:Nellie.Viner@usatriathlon.org), or  
[Legal@usatriathlon.org](mailto:Legal@usatriathlon.org)

**Katie Willemarck**, USAT CFO  
[Katie.Willemarck@usatriathlon.org](mailto:Katie.Willemarck@usatriathlon.org)