



## **USA Lacrosse Gifts and Entertainment Policy**

### **Purpose:**

The giving and receiving of business courtesies (i.e. gifts, meals, and entertainment) is a common business practice designed to build relationships with partners. At the same time, it is critically important that business courtesies – whether given or received – never compromise, or appear to compromise, our ability or the ability of a party with whom we do business to make objective and fair business decisions.

We must always ensure the business decisions we make, as well as decisions made by our business partners, are based on the merits of products or services offered rather than in response to the provision of courtesies.

### **Applicability:**

This policy applies to USA Lacrosse Representatives (“Representatives”), defined as employees, board of directors, officers, and committee members, task force members, hearing panel members, contractors (if not included in third-party contract), domestic partner, immediate family members \*, and volunteers with board of directors delegated powers or substantial decision-making authority.

\* “Immediate Family members” shall be defined spouse, child, stepchild, parent, sibling, domestic partner, parent of spouse/domestic partner and sibling and child of domestic partner.”

### **Types:**

This Policy covers the following types of business courtesies (“courtesies”) exchanged with external and internal parties:

- Gifts – any type of gift, whether or not involving money, including personal gifts deemed to have any type of value (at the time or in the future)
- Entertainment – attendance at social, cultural, or sporting events, as well as meals,

drinks, lodging, and travel expenses, as a few examples.

## **Policy Statement:**

From time to time, USA Lacrosse Representatives may be offered a courtesy from individuals or companies we do business with, are interested in doing business with, or potentially may do business with USA Lacrosse. Additionally, there may be times where it is in USA Lacrosse interest for USA Lacrosse Representatives to offer courtesies to a third party.

USA Lacrosse Representatives may not, under any circumstances, actively solicit any type of courtesies or permit/ authorize participation in any courtesies that might be considered lavish, inappropriate or illegal. [Please review Disclosure and Approval section below.]

## **General Rules:**

1. **No Inducement:** You may give or receive courtesies to or from customers, suppliers or others only if doing so does not violate any applicable law and would not be viewed as an inducement to or reward for any particular business decision or violate this Policy.
2. **Do Not Give What You Cannot Receive:** You should never provide any types of courtesies which you could not accept.
3. **No Inappropriate Courtesies:** Some types of courtesies are simply wrong, either in fact or appearance, and are never permissible. These include, without limitation, favors or courtesies that would be illegal, unsavory, or that would violate USA Lacrosse commitment to diversity and mutual respect (i.e. event at a sexually oriented venues).
4. **No Cash Gifts:** Gifts of cash or cash equivalents (including, without limitation, loans, stock options, stock, traveler's checks, money orders, investment securities, bonds, cryptocurrency, or other negotiable instruments) are generally prohibited (i.e. fundraising exceptions).
5. **Follow our Business Partners' Policies:** Any situation that would cause a business partner to feel uncomfortable, would violate the Gift and Entertainment Policy of the recipient's company, or would embarrass USA Lacrosse by its public disclosure is prohibited. This means for any courtesies you plan to provide to a business partner it is your responsibility to inquire whether receipt

would violate the recipient's policies.

6. **No Bribes:** It is never acceptable to offer, provide, solicit or accept bribes, kickbacks or other improper payments. You must always avoid even the appearance of corruption or a conflict of interest when giving or receiving courtesies.
7. **No Services:** Courtesies may not be given in the form of services or other benefits that lack a cash value (e.g. the promise of employment, sexual favors).
8. **Accurate Reporting:** All courtesies expenses that you provide should be accurately accounted for on expense reports. Expense reimbursement requests for courtesies will be monitored by both Finance and Legal, and in order to be reimbursed, any courtesies you provide must satisfy not only this Policy, but also the requirements set forth in the USA Lacrosse Trip and Travel Policy.

## **Specific Rules for Courtesies Received by a USA Lacrosse Representative**

### **Gifts:**

Gifts such as any tangible item or gift certificates may be accepted from a business partner or prospective business partner if the retail value of the gift does not exceed \$100 per person per year from the specific business partner. In addition, gifts that have the licensed logo of USA Lacrosse on them (e.g., jackets, scarves, mugs, hats) may be accepted if their retail value does not exceed \$500 per Representative per year from the specific business partner.

### **Entertainment:**

Entertainment may be accepted as long as the combined value does not exceed \$500 per Representative per year. Only the cost of the USA Lacrosse Representative's entertainment may be accepted, thus if a spouse or immediate family member accompanies the USA Lacrosse Representative, his/her costs may not be covered.

### **Disclosure and Approval:**

All courtesies that violate and/or potentially violate the terms/amounts outlined in this Policy must be promptly disclosed to and/or approved in advance by the General Counsel of USA Lacrosse (ezavian@usalacrosse.com). All courtesies must be covered by the appropriate USA Lacrosse budget and must be approved in advance by the applicable USA Lacrosse leader (i.e. Director or above).

Generally, giving or receiving courtesies are limited under this Policy and USA Lacrosse

Representatives are encouraged to seek advice (from the General Counsel of USA Lacrosse) about giving or receiving courtesies.

### **Specific Rules for Courtesies Provided by a USA Lacrosse Representative**

Courtesies, 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 President and CEO.

#### **Social Event Exception**

There may be times when a USA Lacrosse Representative wishes, as a business matter, to extend to a current or potential USA Lacrosse business partner (i.e., an individual or company) a courtesy to attend a social event (e.g., reception, meal, sporting event, or theatrical event) to further or develop a business relationship.

In such instances, courtesies must meet the same rules as courtesies that may be accepted by USA Lacrosse Representatives, with specific differences noted herein. Invitations to events must be reasonable and appropriate. Topics of a business nature must be discussed at the event, and the USA Lacrosse Representative must be present. The cost associated with such an event should not exceed \$250 per person/company per year (except with regard to events associated with fundraising functions\*), without the prior written approval of the VP of Corporate Partnerships or President and CEO.

\*USA Lacrosse recognizes that the foregoing limits may hamper fundraising functions and/or efforts. In light of this, the foregoing limits will not apply to fundraising and/or efforts if the courtesy is part of normal and reasonable job duties and the event is not lavish or unreasonable. For fundraising and/or efforts, costs of gifts and events should not exceed \$600 per person per year.

#### **Government Employees and Foreign Officials Limited or Prohibited**

The giving of courtesies to foreign officials or federal, state and local government employees is governed by a complex set of rules. Generally, the giving of courtesies to foreign officials or government employees is very limited or prohibited. Before offering courtesies to a foreign official or government employee, you must receive the approval of the President and CEO.

**The Gift Disclosure form is attached and must be completed for gifts over the limit herein declared.**

***Any questions, please contact legal at [lquinn@usalacrosse.com](mailto:lquinn@usalacrosse.com) or 410.235.6882***

## USA Lacrosse Gift/Entertainment Disclosure Form

Please complete this form immediately upon receipt of personal gifts or entertainment received in your capacity as an employee or representative of USA Lacrosse.

Name: \_\_\_\_\_  USA Lacrosse Employee  Board of Director  
 Officers  Committee Members  Task Force Members  Hearing Panel Members  Contractors (if not included in contract)  Spouses/Life-Partner  Immediate Family Member  Volunteers with powers/decision-making authority  Other \_\_

Representative Position/Title:

Please describe the gift/entertainment received:

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The retail value of the gift /entertainment 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/entertainment (name and relationship to USA Lacrosse) and under what circumstances it was received:

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Indicate below any matters pending or likely to arise in the future that might involve the gift/entertainment giver:

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Have you received prior courtesies from this individual entity in the past two years? If yes, did you disclose them? Please describe courtesies here:

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**Certification:** I certify that this gift/entertainment was not solicited.

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

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

*Send this completed form to:* Larry Quinn, Counsel: [lquinn@usalacrosse.com](mailto:lquinn@usalacrosse.com)