



## Gifts and Entertainment Policy

Updated October 2025

### 1. Introduction and Applicability

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

This Policy should not be interpreted as encouraging 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 Affiliated Individual has any questions or concerns about giving and receiving gifts or invitations to events, please contact the USAT Legal Team at [legal@usatriathlon.org](mailto:legal@usatriathlon.org).

### 2. Gift Thresholds and Disclosure Requirements

- i. All Affiliated Individuals may keep and are not required to report gifts valued at less than \$250. Affiliated Individuals are also not required to report gifts given valued at less than \$250.
- ii. Sponsor discounts and provided products are not considered gifts, provided they are provided or offered as part of doing business on behalf of USAT. Furthermore, Affiliated Individuals are permitted to purchase goods or services from sponsors, partners or other companies related to our sport at a discount or at wholesale price.

#### ***Hypothetical Examples:***

KillerShark Wetsuits decides to give each of our Development Team athletes a package of wetsuits (sleeved, sleeveless and wetsuit shorts) worth \$1500. The coach of the Development Team would like to purchase this package for his or her own personal use, and KillerShark Wetsuits agrees to sell the package to the coach for the wholesale price of \$500. This is permitted and does not require disclosure. Alternatively, if KillerShark Wetsuits were to say, “no, don’t pay the wholesale price, I’ll give it to you for free”, this is not permitted and the coach should refer to section iv. below on next steps.

USAT signs a new partnership agreement with Speedster sneaker brand. Speedster offers each employee one pair of free running shoes and a member of the USAT partnership team circulates a link for employees to order their shoes. This would be permitted.

- iii. Affiliated Individuals should never give or receive cash or gift cards; if you receive a cash or gift card, please contact the USAT Legal Team.

- iv. Any gift, whether given or received, valued at \$250 or over must be submitted to the USAT Legal Team for review and approval by completing the USA Triathlon Gift and Entertainment Disclosure Form (attached). The USAT Legal Team will evaluate whether it is appropriate for the Affiliated Individual to keep the gift, and if so, what action should be taken or whether the gift should be returned.

### 3. Entertainment and Travel Benefits

- i. Any tickets to entertainment or sporting events valued at \$250 and above, whether given or received, should be disclosed to the USAT Legal Team for review and approval by completing the USA Triathlon Gift and Entertainment Disclosure Form (attached).
- i. The Affiliated Individual may keep the tickets if their value is less than \$250.

#### ***Hypothetical Examples:***

The USAT Events team is in RedTownVille trying to determine whether it is a good location for the next national championships:

- the local sports commission offers the team lead 4 Taylor Swift tickets for the 4 person team to use (valued at \$180 each), these would not need to be disclosed as the value per USAT team member is \$180 each.

#### ***HOWEVER, IF***

- the local sports commission offers the team lead 4 Taylor Swift tickets for their own use (valued at \$180 each and therefore totaling \$720), the team lead would need to disclose and seek approval if they used them for themselves/family/friends as the value per USAT team member is \$720 each.
- ii. Any employee travel or accommodation paid for by a third party (regardless of value) should be disclosed to the USAT Legal Team and approved prior to use.

### 4. Gifts and Entertainment to Government Employees

The giving of gifts or entertainment to federal, state, and local government employees (together “**government employees**”) is governed by a complex set of rules that is typically agency specific. Generally, the giving of gifts or entertainment to government employees is very limited or prohibited. Before offering a gift or entertainment to a government employee, of any value, you must receive approval from the USAT Legal Team in writing by completing the USA Triathlon Gift and Entertainment Disclosure Form (attached).

### 5. Reporting

If an Affiliated Individual is required to disclose or submit for review and approval any entertainment or gift based on the foregoing, they should complete and email the **USA Triathlon Gift and Entertainment Disclosure Form** (attached) to the USAT Legal Team at [Legal@usatriathlon.org](mailto:Legal@usatriathlon.org). On the disclosure form, the Affiliated Individual must provide a description of the item or entertainment, its value, the relevant dates, the parties involved and all other relevant information. If your request is time sensitive, please reach out to the legal team via Slack or phone for a quick resolution.

### 6. Summary

If an Affiliated Individual has any questions or concerns about this Policy, they may contact the USAT Legal Team which is responsible for this Policy and its enforcement at [Legal@usatriathlon.org](mailto:Legal@usatriathlon.org).



## **USA Triathlon Gift and Entertainment Disclosure Form**

Please complete this form immediately upon giving or receiving a gift or entertainment that requires disclosure or approval, in your capacity as an employee or representative of USA Triathlon and email to [legal@usatriathlon.org](mailto:legal@usatriathlon.org) for approval.

Note: If you are *not* approved to keep the gift or entertainment, you may be required to return or decline it. Other remedies may include donating the gift to USA Triathlon, submitting a donation to the USA Triathlon Foundation, or other measures that the USAT Legal Team deems appropriate.

**Name:**

**Email Address:**

**Position/Title:**

**Please indicate your role with USAT:**

Employee\*    Board Member    Committee Member    Hearing Panel Member

Other (please specify):

*\*If you are a USAT employee, please specify your team and manager/supervisor:*

**Estimated value of the gift(s) or entertainment:**

*\*This is a good faith estimate based on retail/ wholesale/face value.*

**Please describe the gift(s) or entertainment given or received and why you are disclosing/seeking approval:**

**Please indicate any matters pending or likely to arise in the future that might involve the third party giver or receiver:**

**Notes (as applicable):**

**By signing below, I certify that this gift or entertainment was not solicited.**

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

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Signature

Date

**Approved by USA Triathlon**

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Signature

Date

Name:

Title:

(where relevant)

**Approved by USA Triathlon Ethics Committee**

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Date

Name:

Chair of Ethics Committee

USAT will maintain copies of all Gift and Entertainment Disclosure Forms in accordance with USA Triathlon's Document Retention Policies and Procedures.