



U.S. Ski & Snowboard Association Gift and Entertainment Policy

This policy serves to guide U.S. Ski & Snowboard employees, Board of Directors, Officers, Officials, Judges, Committee Members, Task Force Members, Jury/Hearing Panel Members, Contractors, Volunteers, anyone acting in an official capacity for U.S. Ski & Snowboard, and the immediate family members of the above (collectively, "U.S. Ski & Snowboard Team Members") regarding how to handle gifts, entertainment, invitations, or other favors.

From time to time a U.S. Ski & Snowboard Team Member may be offered a gift or invitation to a sporting event or other form of entertainment from individuals or companies that do business with or are interested in doing business with U.S. Ski & Snowboard. Additionally, there may be times where it is in U.S. Ski & Snowboard's interest for U.S. Ski & Snowboard Team Member to offer a gift or invitation to an event to a third party.

This policy should not be considered in any way as an encouragement to make, solicit or receive any type of entertainment or gift. Indeed, U.S. Ski & Snowboard Team Members may not, under any circumstances, actively solicit any type of entertainment or gift. Further, U.S. Ski & Snowboard will not under any circumstances permit or authorize participation in any business gifts or entertainment that might be considered lavish, inappropriate, or illegal.

U.S. Ski & Snowboard Team Members with questions or concerns about the giving or receiving of a gift should discuss that concern or question with the Ethics Officer, currently the Vice President, People, DEI, and Safe Sport. The final arbiter of any issue relating to or concerning this policy is U.S. Ski & Snowboard's Ethics Committee.

Receiving Business Gifts

General Rules:

I. Current Business Partners: U.S. Ski & Snowboard Team Members may accept gifts from individuals and companies that currently do business with, or make donations to, U.S. Ski & Snowboard as follows: (a) partner/ sponsor/supplier products and partner/sponsor/supplier-branded products (e.g. logo jackets) with a value of up to \$1,000 per U.S. Ski & Snowboard Team Member, per year, per individual/company; (b) other gifts with a value of not more than \$250 per U.S. Ski & Snowboard Team Member, per year, per individual/ company; (c) invitations for U.S. Ski & Snowboard employee/Board member to attend sporting events with an individual/company representative (including travel to and from such events only to the extent approved in advance by the Ethics Officer); (d) on an infrequent basis, invitations for a spouse or family member to join the U.S. Ski & Snowboard employee/Board member at a sporting event with an individual/company representative; (e) invitations to attend fundraising events with an individual/company representative at no cost to the U.S. Ski & Snowboard Team Member; (f) 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 \$250 per U.S. Ski & Snowboard Team Member per event and \$500 total per individual/company per year; and (g) perishable or consumable gifts provided that the gift is reasonable and not unduly lavish.

II. Prospective Business Partners: U.S. Ski & Snowboard Team Members may accept gifts from individuals and companies that are not current business partners of U.S. Ski & Snowboard, but that may or may not be seeking to engage in a business relationship with U.S. Ski & Snowboard as follows: (a)



gifts with a value of not more than \$250 per U.S. Ski & Snowboard Team Member, per year, per individual/company; (b) invitations for the U.S. Ski & Snowboard employee/Board member to attend sporting events with an individual/company representative (but not travel to and from such events); (c) invitations to attend fundraising events with an individual/company representative; (d) invitations to attend other social, educational or entertainment events intended to promote the possible business relationship, provided that the cost of the event does not exceed \$250 per U.S. Ski & Snowboard Team Member per event and \$500 total U.S. Ski & Snowboard Team Member per individual/company per year.

III. Anonymous Gifts/Gifts from International Organizations: Anonymous gifts and gifts from international organizations that are in excess of the limits outlined in this policy to U.S. Ski & Snowboard Team Members in their official capacity must be disclosed and donated to U.S. Ski & Snowboard or another agreed upon charity.

Disclosure and approval:

All gifts or invitations falling under section I (a), I (c), II (b) and III above and all invitations that involve the third party paying for the U.S. Ski & Snowboard Team Member's travel and/or overnight accommodations must be promptly reported to the Ethics Officer. Prior to accepting invitations to opportunities that include travel and overnight accommodations, written approval must be received from the U.S. Ski & Snowboard Team Member's supervisor and the Ethics Officer.

Any potential gifts or invitations extended that exceed the limits and/or parameters noted above must be disclosed to, and approved in advance by, the Ethics Officer before they may be accepted/given. When any U.S. Ski & Snowboard Team Member is representing U.S. Ski & Snowboard, all such gifts that exceed the limits of this policy or are considered lavish, unless approved otherwise, belong to U.S. Ski & Snowboard. The Ethics Committee or Ethics Officer shall have the right, in consultation with the affected U.S. Ski & Snowboard Team Member, to require that any gift(s) be donated to U.S. Ski & Snowboard or another agreed upon charity if the Ethics Committee believes that such gift(s) is not proper and/or creates an appearance of impropriety.

Business Courtesies

General rules:

There may be times when a U.S. Ski & Snowboard Team Member (for purposes of this section "U.S. Ski & Snowboard Host") wishes, as a business matter, to extend to a current or potential U.S. Ski & Snowboard 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 \$500 per person per year, without the prior written approval of the President & CEO and the Ethics Officer. All cash gifts in the form of per diems or other such methods, even if under \$250, shall have prior written approval of the Ethics Officer.

Invitations to events must be reasonable and appropriate. Topics of a business nature must be discussed at the event, and the U.S. Ski & Snowboard Host must be present. The cost associated with such an event should not exceed \$500 per person/company per year, except with regard to sporting events and fundraising functions, without the prior written approval of the President & CEO and the Ethics Officer. Moreover, such business entertainment 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 & CEO and the Ethics Officer. All such business entertainment must comport with the code of conduct or code of ethics of the recipient's organization.

Development Division:

U.S. Ski & Snowboard recognizes that the foregoing limits may hamper the ability of the U.S. Ski and Snowboard Team Foundation or Sales / Commercial Marketing staff to perform their job functions. In light of this, the foregoing limits will not apply to this Development Division if the invitation/event/etc. is part of normal and reasonable job duties and the event is not lavish or unreasonable. For these staff members, costs of gifts and events should not exceed \$1,000 per person per year.

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, you must receive the approval of the General Counsel's office and the Ethics Officer.

Disclosure and approval:

All gifts or invitations must be covered by the appropriate U.S. Ski & Snowboard budget and must be approved in advance by the applicable U.S. Ski & Snowboard Team Member's supervisor.

Any potential gifts or invitations extended that exceed the limits and/or parameters noted above must be disclosed to, and approved in advance by, the President & CEO and the Ethics Officer before they may be offered.

Summary

Generally, giving or receiving gifts or invitations are limited by rules set by U.S. Ski & Snowboard, and U.S. Ski & Snowboard Team Members are encouraged to seek advice if uncertain from either his/her supervisor or the Ethics Officer.