GIFTS AND ENTERTAINMENT POLICY

Policy Owner: **General Counsel**
Effective Date: **June 1, 2026**

Introduction

The Gifts and Entertainment Policy (the "Policy") reinforces USA Football's commitment to maintaining the highest standard of business and personal ethics and is designed to avoid even the appearance of wrongdoing. In addition, the Policy provides direction as it relates to acceptable practices when receiving unsolicited gifts.

For purposes of this Policy, the term "Third Party(ies)" means customers, prospective customers, suppliers, prospective suppliers, and any person with whom USA Football does, or may do, business.

Section 1. Application

This Policy applies to the following individuals (collectively, "Affiliated Individuals"):

- Members of the Board of Directors
- Members of Committees and Ad Hoc Committees
- Staff
- Volunteers
- Contracted Staff (to the extent not otherwise covered by a third-party agreement)
- USAFB National Team/National Team Development Program Athletes
- USAFB National Team/National Team Development Program Coaches
- Relatives*

** "Relative" means a person's immediate family members, meaning parents, children, stepchildren, spouse or domestic partner, and siblings, by birth or by marriage, the parents of a spouse or domestic partner, and the children of a domestic partner, and any other person residing in the same household, consistent with the USA Football Conflict-of-Interest and Ethics Policy*

Section 2. Definition - Gifts and Entertainment

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

"Gifts" – any item of value, whether or not involving money, including personal gifts, including but not limited to merchandise, discounts, gift baskets, gift certificates or gift cards, apparel, and bags.

"Entertainment" – attendance at social, cultural, experiential, or sporting events (including tickets), as well as meals, beverages, lodging, and travel-related expenses, as a few examples.

Section 3. General Gifts and Entertainment Rules

a) **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.

b) **Do Not Give What You Cannot Receive.** You should never provide any types of courtesies which you could not accept.

c) **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 USAFB commitment to diversity and mutual respect (i.e. event at a sexually oriented venues).

d) **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, except as provided in Section 5 (fundraising exceptions) of this Policy.

e) **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 USAFB 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.

f) **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.

g) **No Services.** Courtesies may not be given in the form of services or other benefits that lack cash value (e.g. the promise of employment, sexual favors).

h) **Accurate Reporting.** All courtesies expenses that you provide should be accurately accounted for in 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 USAFB Travel Policy.

Section 4. Permissible Gifts and Entertainment – Received by a USA Football Representative

Affiliated Individuals may accept Gifts and Entertainment from a prospective business partner or business partner that currently does business with, or make donations to, USAFB as follows:

a) Partner, sponsor, or supplier products, including branded items (e.g., logoed apparel), with a total value not to exceed $1,000 per Affiliated Individual, per calendar year, per individual or business;

b) Other gifts (including, but not limited to, merchandise, gift certificates, gift cards, and perishable or consumable items, etc.) with a value not to exceed $100 per Affiliated Individual, per calendar year, per individual or business;

c) Invitations for the Affiliated Individual to attend sporting events with an individual/company representative, provided that the cost does not exceed $500 per Affiliated Individual per event (including travel to and from such events only to the extent approved in advance by USAFB's Judicial Committee);

d) Invitations to attend fundraising events with an individual/company representative at no cost to the covered Affiliated Individual, provided that such attendance serves a legitimate business purpose and is subject to the same limitations and approval requirements under subsection (e).

e) 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 $500 per Affiliated Individual per event and $1,500 total per individual/company per year.

Section 5. Permissible Gifts and Entertainment – Provided by a USA Football Representative

Affiliated Individuals may offer or provide Gifts and Entertainment to a current or potential USAFB business partner (i.e., an individual or company) as 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, the total value of gifts may not exceed $500 in total value per person per calendar year, without the prior written approval of the Judicial Committee.

Invitations to events must be reasonable and appropriate, topics of a business nature must be discussed at the event, and the Affiliated Individual must be present. The cost associated with such an event should not exceed $500 in total value per individual/company per year, except with regard to sporting events and fundraising functions*, without the prior written approval of the Judicial Committee.

**USAFB 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.*

Government Employees. The giving of courtesies to foreign officials, or federal, state, and local government employees is subject to strict legal restrictions. 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 obtain prior written approval from the Judicial Committee in addition to the COO and CFO.

Section 6. Disclosure

All Gifts and Entertainment opportunities must be covered by the appropriate USA Football budget and must be approved in advance by the applicable USA Football supervisor. All gifts or invitations extended that exceed the limits noted above must be immediately disclosed to, and approved in advance and in writing by, the Judicial Committee before they may be offered.

Promotional gifts of nominal value (less than $25 retail value) such as coffee mugs, hats, pins, etc., are generally excluded from disclosure unless they are frequent, cumulative, or could reasonably create the appearance of impropriety.

Declination of Gift or Entertainment. The CFO and CEO, in consultation with the Affiliated Individual, may require that any gift(s) be returned, donated to USAFB, or donated to another agreed-upon charity if it is believed that the gift(s) is not proper and/or creates an appearance of impropriety.

Section 7. Points of Contact

Affiliated persons in need of further information, guidance and/or enforcement in relation to this Gifts and Entertainment Policy may contact the following:

General Counsel at compliance@usafootball.com

In addition, the USOPC Ethics & Compliance team can serve as a secondary resource for questions or concerns regarding this Policy. The USOPC Ethics & Compliance team may be contacted at:

USOPC Integrity Hotline: 877.404.9935

USOPC Integrity Portal: https://usopc.ethicspoint.com

For Athletes with Questions Regarding this Policy:

The Athlete Ombuds provides cost-free, independent and confidential advice regarding athlete rights; resolving disputes or grievances; and any sport rule, policy, or process, including NGB-athlete agreements, codes of conduct or team selection procedures. The Athlete Ombuds can also help athletes connect with legal counsel or mental health resources, if needed. Athletes may contact the Athlete Ombuds at:

Phone: (719) 866-5000
Email: ombudsman@usathlete.org
Website: www.usathlete.org

GIFTS AND ENTERTAINMENT DISCLOSURE FORM

Please complete this form immediately upon receipt or offer of personal gifts or entertainment opportunities received in your capacity as an Affiliated Individual of USA Football.

Name: _____

Affiliated Individual Classification (select one)

☐ Employee	☐ Board Member	☐ Volunteer
☐ Committee Member	☐ Contracted Staff	☐ Relative
☐ National Team/National Team Development Program Athlete	☐ National Team/National Team Development Program Coach	☐ Other

Additional Information (if "Relative" or "Other" selected)

Name of Affiliated Individual (if applicable): _____

Relationship to USA Football Affiliated Individual: _____

Description of Gift of Entertainment

Please provide a description of the Gift or Entertainment received:

_____

Estimated Value: $ _____

Note: Value should be a good-faith estimate based on retail or fair market value. If the value cannot reasonably be determined, please explain below:

_____

Description of Gift or Entertainment:

_____

Source of Gift or Entertainment:

Include name of individual or company and relationship to USA Football, if applicable.

_____

Circumstances of Receipt:

Describe how, when, and why the Gift or Entertainment was received

_____

Conflict of Interest / Related Party Disclosure

Are you aware of any current, pending, or reasonably anticipated matters involving the donor or source that could involve USA Football?

☐ Yes

☐ No

If yes, please explain:

_____

Prior Gifts and Entertainment

Have you received any prior Gifts or Entertainment from this same donor or source within the past year?

☐ Yes

☐ No

If yes, were those previously disclosed in accordance with USA Football's policy?

☐ Yes

☐ No

If yes, please describe prior Gifts or Entertainment received:

_____

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

SIGNATURE:

DATE:

Please submit the completed form to: compliance@usafootball.com