

USROWING GIFTS AND ENTERTAINMENT POLICY

Effective Date: October 1, 2026

I. Purpose

USRowing is committed to sustaining an ethical workplace free of conflicts of interest and perceived conflicts of interest. USRowing therefore has adopted this Gifts & Entertainment Policy to provide instruction to the USRowing Board of Directors, officers, committee members, task force members, hearing panel members, volunteers, employees, and, by extension, their spouses and immediate family members (“Covered Individuals”) regarding how to handle offers of gifts or other forms of entertainment from individuals or companies that do business with, or are interested in doing business with, USRowing. Additionally, where necessary to sustain an ethical workplace, contractors shall be required to comply with this Policy.

This Policy should not be considered in any way as an encouragement to make, solicit, or receive any type of gift or entertainment. Covered Individuals may not, under any circumstances, actively solicit any type of gift or entertainment. Further, USRowing will not under any circumstances permit or authorize participation in any gifts or entertainment that might be considered lavish, inappropriate, or illegal.

II. Receiving Business Courtesies

- 1. Current Business Partners.** Covered Individuals may accept gifts from individuals and companies that currently do business with, or make donations to, USRowing as follows:
 - a. Partner/sponsor/supplier products and partner/sponsor/supplier-branded products (e.g., logoed apparel) with a total value of under \$150 per person, per year, per individual/company;
 - b. Other gifts with a value of no more than \$100 per person, per year, per individual/company;
 - c. Partner/sponsor/supplier travel courtesies not to exceed \$100 per covered individual per trip or \$500 per person, per year, per individual/company and only to the extent approved in advance by USRowing’s Executive Director or Chief Operations Officer, or in the case of the CEO or a board member, by the Governance and Ethics Committee;
 - d. Invitations for the Covered Individual to attend sporting events with an individual/company representative (including travel to and from such events) and only to the extent approved in advance by USRowing’s Executive Director or Chief Operations Officer, or in the case of the CEO or a board member, by the Governance and Ethics Committee;
 - e. On an infrequent basis, invitations for a spouse or family member to join the Covered Individual at sporting events with an individual/company representative;
 - f. Invitations to attend fundraising events with an individual/company representative at no cost to the Covered Individual and only to the extent approved in advance by USRowing’s Executive Director or Chief Operations Officer, or in the case of the CEO or a board member, by the Governance and Ethics Committee;
 - g. 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 \$150 per Covered Individual per event and \$300 total per individual/company per year; and
 - h. Perishable or consumable gifts provided that the gift is reasonable and not unduly lavish.

2. **Prospective Business Partners.** Covered Individuals may accept gifts from individuals and companies that are not current business partners of USRowing, but that may or may not be seeking to engage in a business relationship with USRowing as follows:
 - a. Gifts with a value of not more than \$150 per Covered Individual, per year, per individual/company;
 - b. Invitations for the Covered Individual to attend sporting events with an individual/company representative (and travel to and from such events, only to the extent approved in advance by USRowing's Executive Director or Chief Operations Officer, or in the case of the CEO or a board member, by the Governance and Ethics Committee);
 - 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 \$150 per Covered Individual per event, and \$300 total per Covered Individual per individual/company per year.
3. **Limitation.** Covered Individuals may never accept cash or financial instruments, such as checks or stocks. Under the guidelines set forth herein, Covered Individuals may accept gift certificates or gift cards.

III. Disclosure and Approval

All gifts or invitations that exceed the above limits, and all invitations that involve the third party paying for the Covered Individual's travel and/or overnight accommodations, must be promptly reported to the Executive Director or Chief Operations Officer, or in the case of the CEO or a board member, to the Governance and Ethics Committee, in advance and in writing, before they may be accepted.

In addition, the Executive Director, Chief Operations Officer, or Governance and Ethics Committee as applicable, shall have the right, in consultation with the Covered Individual, to require that any gift(s) be returned, donated to the USRowing Foundation, or donated to another agreed-upon charity if the Executive Director, Chief Operations Officer, or Governance and Ethics Committee as applicable, believes that such gift(s) is not proper and/or creates an appearance of impropriety.

The Gift Disclosure form is attached hereto.

IV. Extending Business Courtesies

1. **General Rules.** There may be times when a USRowing employee or Board member wishes, as a business matter, to extend to a current or potential USRowing 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 in value per person per year, without the prior written approval of the Executive Director or Chief Operations Officer, or in the case of the CEO or a board member, the Governance and Ethics Committee.

Invitations to events must be reasonable and appropriate. Topics of a business nature must be discussed at the event, and the USRowing employee or Board member 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 Executive Director, Chief Operations Officer, or Governance and Ethics Committee as applicable. Moreover, such business entertainment with respect to any particular individual must be infrequent, which, as a general rule, means not more than two times per year. Frequency

beyond the foregoing must be pre-approved in writing by the Executive Director, Chief Operations Officer, or Governance and Ethics Committee as applicable.

USRowing employees or Board members may give gift certificates within the limits set forth in this Policy, but may never give cash or financial instruments, such as checks or stocks.

USRowing employees or Board members are generally prohibited from giving gifts or extending invitations to events to any government employee because gift giving to government employees is subject to complex sets of rules that vary by foreign, federal, state, and local governments. In addition, in some cases giving a gift or extending an invitation to a government official may create an appearance of impropriety, so before offering a gift to a government employee, you must receive the approval of the USRowing Governance and Ethics Committee. This limitation includes the distribution of gifts and/or apparel to government officials touring any USRowing facility or attending a USRowing event.

2. Disclosure and Approval

All gifts or invitations offered by a USRowing employee or Board member must be covered by the appropriate USRowing budget and must be approved in advance by the appropriate USRowing supervisor. All gifts or invitations extended that exceed the limits and/or parameters noted above must be disclosed to, and approved in advance and in writing by, the Executive Director, Chief Operations Officer, or Governance and Ethics Committee as applicable before they may be offered.

V. Contact Information

The USRowing Governance and Ethics Committee are responsible for the enforcement of this Gifts and Entertainment Policy. USRowing's Chair of the Governance and Ethics Committee can be contacted with any questions about this policy at Chair.GovernanceandEthics@USRowing.org.



USROWING GIFT DISCLOSURE FORM

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

Name: _____

- ◆ Employee ◆ Board Member ◆ Volunteer ◆ Committee Member ◆ Hearing Panel Member
- ◆ Task Force Member ◆ Athlete Representative
- ◆ Other (please specify): _____

Please describe the gift(s) received:

The value of the gift 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 (name and relationship to USRowing) and under what circumstances it was received:

Indicate below any matters pending or likely to arise in the future that might involve the donor:

Certification: I certify that this gift was not solicited.

SIGNATURE: _____

DATE: _____

Send this completed form to Brett.Johnson@usrowing.org.