



Member, United States
Olympic & Paralympic Committee

PARALYMPIC OPERATIONS DEPARTMENT

Gifts and Entertainment Policy

Table of Contents

<i>I. Purpose.....</i>	3
<i>II. Applicability of Policy</i>	3
<i>III. Receiving Business Courtesies</i>	3
<i>IV. Disclosure and Approval.....</i>	4
<i>V. Extending Business Courtesies.....</i>	5
<i>a. Development Division/Staff</i>	5
<i>b. Government Employees</i>	6
<i>c. Disclosure And Approval</i>	6
<i>d. The POD Point of Contact.....</i>	6
<i>Appendix A</i>	7
The POD GIFT DISCLOSURE FORM	7

I. Purpose

The Paralympic Operations Department (POD) is committed to sustaining an ethical workplace free of conflicts of interest and perceived conflicts of interest. The POD therefore has adopted this Gifts and Entertainment Policy to provide instruction to the POD's staff, Council member and officers, committee members, task force members, hearing panel members, and volunteers 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, the POD. Additionally, it provides instruction on the POD extending gifts to third parties.

This policy should not be considered in any way as an encouragement to make, solicit or receive any type of gift or entertainment. Indeed, the POD's staff, Council members and officers, committee members, task force members, hearing panel members, and volunteers may not, under any circumstances, actively solicit any type of gift or entertainment. Further, the POD will not under any circumstances permit or authorize participation in any business gifts or entertainment that might be considered lavish, inappropriate or illegal.

II. Applicability of Policy

This Gifts and Entertainment Policy is applicable to all POD staff, Council members and officers, committee members, task force members, hearing panel members, contractors, and volunteers, as well as their spouses and immediate family members ("Affiliated Individuals").

III. Receiving Business Courtesies

a. Current Business Partners

Affiliated Individuals may accept gifts from individuals and companies that currently do business with, or make donations to the POD as follows:

- i. Partner/sponsor/supplier products and partner/sponsor/supplier-branded products (e.g., logoed jackets) with a value of up to \$1,000 per Affiliated Individual, per year, per individual/company;
- ii. Other gifts with a value of no more than \$100 per Affiliated Individual, per year, per individual/company;
- iii. Invitations for the Affiliated Individual 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 POD's Ethics Committee.
- iv. On an infrequent basis, invitations for a spouse or family member to join the Affiliated Individual at sporting events with an individual/company representative;
- v. Invitations to attend fundraising events with an individual/company representative at no cost to the Affiliated Individual;

- vi. 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 \$100 per Affiliated Individual per event and \$400 total per individual/company per year; and
- vii. Perishable or consumable gifts provided that the gift is reasonable and not unduly lavish.

b. Prospective Business Partners

Affiliated Individuals may accept gifts from individuals and companies that are not current business partners of the POD but that may or may not be seeking to engage in a business relationship with the POD as follows:

- i. Gifts with a value of not more than \$100 per Affiliated Individual, per year, per individual/per company;
- ii. Invitations for the Affiliated Individual to attend sporting events with an individual/company representative (but not travel to and from such events);
- iii. Invitations to attend fundraising events with an individual/company representative;
- iv. Invitations to attend other social, educational or entertainment events intended to promote the business relationship provided that the cost of the event does not exceed \$100 per Affiliated Individual, per event and \$200 total per Affiliated Individual, per individual/company, per year.

c. Limitations

Affiliated Individuals may never accept cash or financial instruments, such as checks or stocks. Under the guidelines set forth herein, Affiliated Individuals may accept gift certificates or gift cards.

IV. Disclosure and Approval

All gifts or invitations falling under Section 3(A)(1), Section 3(A)(3), and Section 3(B)(2) above, and all invitations that involve the third party paying for the Affiliated Individual's travel and/or overnight accommodations, must be promptly reported to the Ethics Committee and Executive Director of the POD. Where the gift or invitation is made to the Executive Director of the POD, the requisite disclosure must be made to the Ethics Committee. Prior to accepting invitations or gifts that include travel and/or overnight accommodations during business hours, written approval must be received from the Executive Director of the POD. In the case of the General Counsel's or Executive Director of the POD request for approval, such approval must be received from the Ethics Committee.

Any potential 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 Ethics

Committee or Executive Director of the POD, as appropriate, before they may be accepted.

In addition, the Ethics Committee and Executive Director of the POD may, in consultation with the Affiliated Individual, to require that any gift(s) be returned, donated to the POD, or donated to another agreed-upon charity if the Ethics Committee or Executive Director of the POD believes that such gift(s) is not proper and/or creates an appearance of impropriety. The Gift Disclosure form is attached.

V. Extending Business Courtesies

General Rules

There may be times when an Affiliated Individual wishes, as a business matter, to extend to a current or potential POD 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 \$100 in value per person per year, without the prior written approval of the Executive Director of the POD and/or the Ethics Committee. Invitations to events must be reasonable and appropriate. Topics of a business nature must be discussed at the event, and the POD staff or Council Member must be present. The cost associated with such an event should not exceed \$100 per person/company per year, except with regard to sporting events and fundraising functions, without the prior written approval of the Executive Director of the POD. Moreover, such business entertainment with respect to any particular individual must be infrequent, which, as a general rule, means not more than four (4) times per year. Frequency beyond the foregoing must be pre-approved in writing by the Executive Director of the POD. To the extent the POD staff or Council Member has knowledge of applicable restrictions by a recipient's organization on gifts and entertainment, the POD staff or Council Member must undertake best efforts for all business entertainment and gifts to comport with the restrictions imposed by the recipient's organization.

POD staff or Council 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.

a. Development Division/Staff

The POD recognizes that the limits set forth in Section 5 may hamper the ability of its staff to engage in development opportunities for the POD. In light of this, the foregoing limits will not apply to staff engaged in development roles within the department if the invitation or event is part of normal and reasonable job duties and the staff member and is not lavish or unreasonable. For the staff members

engaged in development for the department only, the cost of gifts and events for which no prior written approval is required is \$600 per person per year. To the extent any gift or invitation exceeds that limitation, the POD staff engaged in development opportunities for the department must obtain the prior written approval from the Executive Director of the POD.

b. Government Employees

The giving of gifts to federal, state, and local government employees is governed by a complex set of rules that is typically agency-specific. Generally, the giving of gifts to government employees is very limited or prohibited. Before offering a gift to a government employee, of any value, you must receive the approval of the Executive Director of the POD in advance and in writing.

c. Disclosure And Approval

All gifts or invitations offered by an Affiliated Individual must be covered by the appropriate POD budget specific to the operations of the sport(s) managed by the POD and must be approved in advance by the Executive Director of the POD. 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 of the POD before they may be offered.

d. The POD Point of Contact

Affiliated persons in need of further information or guidance in relation to this policy should contact the Executive Director of the POD.

Appendix A

The POD GIFT DISCLOSURE FORM

Please complete this form immediately upon receipt of personal gifts¹ received in your capacity as a staff member or representative of the POD.

Name: _____

- POD staff member POD Council Member POD Volunteer
 POD Committee Member POD Hearing Panel Member
 POD Task Force Member Athlete Representative
 Contractor
 Other (please specify): _____

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 the POD) and under what circumstances it was received:

- Current business partner: _____
 Prospective business partner: _____
 Other: _____

- 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.

¹ POD defines personal gifts as items of value provided by individuals and/or organizations with present or prospective business relationships with the POD. Excluded from disclosure are promotional gifts of nominal value (less than \$50 retail value) such as coffee mugs, hats, pins, etc.

Name (printd)

Signature

Date

Send this completed form to: Dr. Kelley Humphries, Executive Director of the Paralympic Operations Department at Logan University at Kelley.Humphries@logan.edu