



USA SHOOTING GIFTS AND ENTERTAINMENT POLICY

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1. Purpose

USA Shooting is committed to maintaining the highest standards of ethical conduct and fostering a culture that avoids both actual conflicts of interest and the appearance of impropriety. This policy establishes rules for accepting and offering gifts and invitations to events in connection with USA Shooting business relationships. It is intended to ensure that all such activities are appropriate, transparent, and consistent with USA Shooting values.

This policy should not be interpreted as encouragement to solicit or receive gifts or entertainment. Under no circumstances may any Affiliated Individual, as defined below, solicit gifts or entertainment, nor may USA Shooting permit participation in any activity that is lavish, inappropriate, or illegal.

2. Applicability

This policy applies to all USA Shooting employees, board members and officers, committee members, task force members, hearing panel members, contractors, officials, and volunteers, as well as their spouses, partners and immediate family members (collectively, "Affiliated Individuals").

3. Definitions

An “Affiliated Individual” is defined as all USA Shooting employees, board members, officers, committee members, task force members, hearing panel members, contractors, officials, and volunteers, as well as their spouses and immediate family members.

A “Current Business Partner” is an individual or organization with which USA Shooting conducts business, including sponsors, vendors, and service providers.

A “Prospective Business Partner” is an individual or an organization that seeks to do business with USA Shooting. Prospective Business Partners include individuals or organizations that submit responses to USA Shooting bid requests or that may seek out a USA Shooting employee, board member, or committee member to pitch a business relationship. Similarly, a Prospective Business Partner may be an individual or organization to whom USA Shooting reaches out to discuss potential business opportunities.

“Value” refers to the retail or fair market value of a gift or event.

4. Prohibited Conduct

Affiliated Individuals may not solicit gifts or entertainment under any circumstances. Affiliated Individuals may not accept or give cash or financial instruments, including checks or stocks. Gifts from anonymous sources may not be retained and must be disclosed and managed in accordance with this policy.

Any gift, entertainment, or invitation that creates a real or perceived conflict of interest or an appearance of impropriety must be declined, disclosed, or surrendered. USA Shooting reserves the right to require that any such gift be refused, returned, or donated.

5. Gifts Not Requiring Disclosure

The following items do not require disclosure or approval under this policy:

- Any item or event which is available to the general public where the Affiliated Individual pays fair market value.
- Promotional items provided to all attendees at an event or items with a retail value of less than \$25.
- Gifts exchanged between relatives or close personal friends when unrelated to the individual’s role with USA Shooting.
- Items that may be publicly displayed or shared among staff, such as flowers or food.
- Reasonable meals or refreshments provided as part of a business meeting or reception attended by an Affiliated Individual in an official capacity.

6. Accepting Gifts and Invitations to Events

A. Current Business Partners

Affiliated Individuals may accept gifts and invitations from Current Business Partners within the following limits. Branded or sponsor-provided products may be accepted up to a total value of \$1,000 per year per partner. Other gifts may be accepted up to a value of \$200 per year per partner.

Affiliated Individuals may accept invitations to sporting events, entertainment events, or similar activities provided there is a legitimate business purpose, the value of any single event does not exceed \$200 per person, and the total annual value from a single partner does not exceed \$500. Travel or lodging associated with such events may only be accepted with prior written approval as set forth below in Section 7. Invitations extended to spouses or family members may be accepted on an infrequent basis provided they remain within these same limits. Invitations to fundraising events may also be accepted when appropriate and approved as set forth below in Section 7.

B. Prospective Business Partners

Affiliated Individuals may accept gifts and invitations from Prospective Business Partners within the same limits as Current Business Partners. Gifts may not exceed \$200 per year per partner. Invitations to events may be accepted provided there is a legitimate business purpose, the value of any single event does not exceed \$200 per person, and the total annual value from such Prospective Business Partner to the Affiliated Individual does not exceed \$500 per year per partner.

Affiliated Individuals must pay their own travel expenses associated with such events unless an exception is approved in advance as set forth below in Section 7.

C. Limitations

Affiliated Individuals may accept gift certificates within the limits set forth in this policy, but may never accept cash or financial instruments, such as checks or stocks, in any amount from any source.

7. Disclosures and Approvals

Affiliated Individuals must promptly disclose any or all gift or invitations received in their capacity as an employee or representative of USA Shooting to the Chief Executive Officer (“CEO”) or the CEO’s Designee, except for the gifts and invitations described in the policy section titled “Gifts Not Requiring Disclosure.” Where the gift or invitation is given to the CEO or CEO Designee, the required disclosure must be made to the Ethics Committee at Ethics@usashooting.org.

Prior to accepting invitations or gifts that include travel and/or overnight accommodation, written approval must be received by the CEO or CEO's Designee. In the case of the CEO's or CEO Designee's request for approval, such approval must be received from the Ethics Committee at Ethics@usashooting.org.

If an Affiliated Individual receives a gift that exceeds the permissible limits but cannot reasonably be declined, the gift must be disclosed promptly and provided to the CEO or CEO's Designee. USA Shooting may require that such gifts be surrendered and donated in accordance with applicable policies. The CEO or CEO's Designee will log the receipt of these surrendered and donated gifts. If the CEO receives a gift that exceeds the permissible limits, the required disclosure must be made to the Ethics Committee at Ethics@usashooting.org.

If a gift is otherwise permissible but creates a perceived conflict of interest or appearance of impropriety, USA Shooting may require that the gift be surrendered, donated or disclosed by the Affiliated Individual on a conflict of interest disclosure form.

The Gift Disclosure Form is provided at the end of this policy as Appendix "A".

8. Giving Gifts and Extending Invitations to Events

A. External Parties

When giving gifts or extending invitations to Current or Prospective Business Partners, Affiliated Individuals must ensure that such actions are reasonable, appropriate, and intended to support legitimate business relationships. Gifts may not exceed \$200 per person per year. Invitations to events may not exceed \$200 per person without prior approval.

Gifts or entertainment may not be offered to government employees unless allowed in the policy section titled "Government Employees." If there is any uncertainty about whether someone qualifies as a government official, you must consult the CEO or contact Compliance@usashooting.org before providing any gift.

B. Internal Gifts (USA Shooting Personnel)

Gifts exchanged between USA Shooting personnel should be reasonable and appropriate. Gifts between individuals who do not have a reporting relationship should not exceed \$25 in value. Gifts between supervisors and direct reports are discouraged except for limited circumstances such as team celebrations or equal-value holiday gifts. Participation in group gifts must be voluntary, and contributions must not be solicited in a coercive manner.

C. Board and Committee Members

USA Shooting may provide a gift to a departing board or committee member as an expression of gratitude for his or her service. The value of such gifts must not exceed \$200.

9. Government Employees

Affiliated Individuals 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. Any proposed gift or invitation must be reviewed and approved in advance in writing by the CEO or CEO's Designee.

Affiliated Individuals should also refer to the [USOPC's Anti-Bribery and Anti-Corruption Policy](#) for gift considerations related to USA Shooting's interactions with international federations and organizing committees.

10. Policy Violations

Violations of this policy may result in disciplinary action, up to and including termination of employment or removal from position. Matters may also be referred to the Ethics Committee at Ethics@usashooting.org for further review.

11. Point of Contact

Questions regarding this policy or specific situations should be directed to the CEO, the USA Shooting Accounting Director, the CEO's Designee or the USA Shooting Ethics Committee at Ethics@usashooting.org. Contact information is provided on the USA Shooting [website](#).

APPENDIX "A"

USA SHOOTING GIFT DISCLOSURE FORM

Please complete this form immediately upon receipt of gifts¹ received in your capacity as an employee or representative of USA Shooting.

Name: _____

- USA Shooting Employee
- USA Shooting Board Member
- USA Shooting Committee Member
- USA Shooting Hearing Panel Member
- USA Shooting Task Force Member
- Athlete Representative
- Contractor
- USA Shooting Volunteer
- 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 USA Shooting 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.

SIGNATURE: _____

DATE: _____

Send this completed form to the USA Shooting CEO and Director of Accounting. For gifts to the CEO, send the completed form to the USA Shooting Ethics Committee at Ethics@usashooting.org.

¹ USA Shooting defines personal gifts as items of value provided by individuals and/or organizations with present or prospective business relationships with USA Shooting. See USA Shooting Gift and Entertainment Policy for exceptions to this definition.