



USA SURFING POLICY: BUSINESS COURTESIES—GIFTS AND ENTERTAINMENT

From time to time in the course of an employee's employment or a Board member's tenure with the USA SURFING, he or she 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, the USA SURFING. Additionally, there may be times where it is in the USA SURFING's interest for an employee or Board member to offer a gift or invitation to an event to a third party. This policy is intended to guide USA SURFING Team Members (defined below) regarding how to handle such situations.

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

In addition to gifts and invitations received by USA SURFING employees and Board members, this policy applies to gifts and invitations to the employee's or Board member's spouses and immediate family members. "USA SURFING Team Member" is intended to cover all of these individuals. USA SURFING Team Members with questions or concerns about the giving or receiving of a gift should discuss that concern or question with the Ethics Officer.

Receiving Business Courtesies

General Rules:

I. Current Business Partners: USA SURFING Team Members may accept gifts from individuals and companies that currently do business with, or make donations to, the USA SURFING as follows: (a) partner/sponsor/supplier products and partner/sponsor/supplier-branded products (e.g., logoed jackets) with a value of up to \$1,000 per USA SURFING Team Member, per year, per individual/company; (b) other gifts with a value of not more than \$100 per USA SURFING Team Member, per year, per individual/company; (c) invitations for the USA SURFING 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 Committee); (d) on an infrequent basis, invitations for a spouse or family member to join the USA SURFING 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 USA SURFING 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 \$100 per USA SURFING Team Member per event and \$400 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: USA SURFING Team Members may accept gifts from individuals and companies that are not current business partners of the USA SURFING, but that may or may not be seeking to engage in a business relationship with the USA SURFING as follows: (a) gifts with a value of not more than \$100 per USA SURFING Team Member, per year, per individual/company; (b) invitations for the USA SURFING 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 \$100 per USA SURFING Team Member per event and \$200 total per USA SURFING Team Member per individual/company per year.

USA SURFING colleagues may accept gift certificates within the limits set forth in this policy, but may never accept cash or financial instruments (e.g., checks, stocks).

Disclosure and approval:

All gifts or invitations falling under section I(a), I(c) and II(b) above and all invitations that involve the third party paying for the USA SURFING 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 during business hours, written approval must be received from the USA SURFING 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.

In addition, the Ethics Committee shall have the right, in consultation with the effected USA SURFING Team Member, to require that any gift(s) be donated to the USA SURFING or another agreed upon charity if the Ethics Committee believes that such gift(s) is not proper and/or creates an appearance of impropriety.

The Gift Disclosure can be found on the USA SURFING Organizational Team Site in the Slack Application

Extending Business Courtesies

General rules:

There may be times when a USA SURFING employee or Board member (for purposes of this section "USA SURFING Host") wishes, as a business matter, to extend to a current or potential USA SURFING 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 per person per year, without the prior written approval of the CEO and the Ethics Officer.

Invitations to events must be reasonable and appropriate. Topics of a business nature must be discussed at the event, and the USA SURFING Host must be present. The cost associated with such an event should not exceed \$100.00 per person/company per year, except with regard to sporting events and fundraising functions, without the prior written approval of the 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 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.

USA SURFING colleagues may give gift certificates within the limits set forth in this policy, but may never give cash or financial instruments (e.g., checks, stocks).

Partner Development Division:

The USA SURFING recognizes that the foregoing limits may hamper the ability of Partner Development Division team members to perform their job functions. In light of this, the foregoing limits will not apply to the Partner Development Division if the invitation/event/etc. is part of normal and reasonable job duties and the event is not lavish or unreasonable. For the Partner Development Division, costs of gifts and events should not exceed \$600 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 Legal and Government Affairs Department and the Ethics Officer.

Disclosure and approval:

All gifts or invitations must be covered by the appropriate USA SURFING budget and must be approved in advance by the applicable USA SURFING 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 CEO and the Ethics Officer before they may be offered.

Summary

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