

**THE ARIZONA SPORTS FOUNDATION;  
VALLEY OF THE SUN BOWL FOUNDATION;  
FIESTA EVENTS, INC.;**  
**AND**  
**THE ARIZONA COLLEGE FOOTBALL CHAMPIONSHIP FOUNDATION**  
**(collectively, the “Foundation”)**

**TICKET POLICY**

**Purpose:**

To establish standards for the provision of complimentary tickets, discounts on tickets and access to tickets by directors, officers, employees, consultants and agents of the Foundation.

**Policy:**

As a non-profit organization, the Foundation strives to generate the maximum revenue through the sale of tickets to Foundation games and invitations to Foundation events while allowing, when appropriate, the use of complimentary and discounted tickets and invitations to advance its mission and to achieve the Foundation’s charitable purposes. It is imperative we maintain controls and policies over the distribution of tickets to the Foundation games and related events in order to achieve the charitable purposes of the Foundation. A primary condition in maintaining our non-profit status is that tickets are not to be used as a means to distribute compensation to any directors, officers, employees, consultants or agents. The Foundation will not tolerate use of tickets for personal gain or benefit of the Foundation’s directors, officers, employees, consultants or agents. In addition, in certain circumstances, federal (including IRS rules and regulations), state and tribal laws restrict the provision of tickets in certain circumstances.

Violations of this Policy and/or federal, state or tribal laws involving complimentary or discounted tickets or invitations may result in disciplinary action, up to and including termination of employment.

**Controls:**

The Chief Financial Officer designated by the Board shall be responsible for Ticket Operations (“CFO”). The CFO will have direct reporting responsibility to the Audit & Compliance Committee, Executive Committee and the Board with respect to all compliance issues which may arise from time to time. The CFO will monitor the distribution of the tickets and invitations to Foundation games and events, prepare written reports to be supplied to the Audit & Compliance Committee, and ensure compliance with all federal, state and tribal laws. The written reports will reflect all tickets given or provided at a discount to any entity or person, the title of that entity or person, and the charitable purpose of the gift or discount. The reports will also identify any public official who received access to tickets other than purchasing through publicly-available channels.

The CFO will develop forms, procedures and training to ensure that all employees and agents comply with all federal, state and tribal laws with respect to tickets and invitations.

**Complimentary or Discounted Tickets Policy:**

When used properly and in compliance with federal, state and tribal laws, complimentary and discounted tickets are a powerful public relations tool. Misuse can, however, result in significant criminal, civil, administrative or tax sanctions. All Foundation employees and agents should be knowledgeable of all legal constraints and requirements with respect to complimentary and discounted tickets. The CFO is responsible for providing all employees and agents with appropriate training with respect to the laws and rules governing complimentary and discounted tickets.

The CFO is responsible for the accounting and distribution of all complimentary or discounted tickets.

Complimentary or discounted tickets cannot be resold.

The Internal Revenue Service has determined that complimentary and discounted tickets are a taxable benefit. The CFO will prepare all necessary reports that reflect actual value of the complimentary or discounted tickets provided to any employee or agent of the Foundation as taxable compensation. To the extent that any employee or agent provides complimentary or discounted ticket to any third person not consistent with the charitable purposes of the Foundation and in compliance with the Foundation's policies and procedures, the Foundation will treat the use of the ticket as by the employee or agent and the CFO will prepare all necessary reports that reflect actual value of the complimentary or discounted tickets provided to any director, officer, employee, consultant or agent of the Foundation as taxable compensation.

For further information on complimentary foundation employee tickets, please refer to the "Staff Tickets Policy".

**Public Officials:**

The Foundation will comply with all federal, state and tribal laws governing the provision of tickets and invitations, including mere access. Complimentary, discounted or access to tickets for the direct or indirect benefit of any public official must comply with the following procedure:

- Any Foundation director, officer, employee, consultant or agent, including but not limited to any lobbyist, seeking to give a public official any complimentary or discounted tickets or access to tickets other than through public channels must prepare a written request to the CFO.
- Any employee or agent giving a public official a complimentary or discounted ticket without prior written approval from the CFO and the Executive Committee may be subject to disciplinary action, up to and including termination of employment.

- In most cases, Arizona law bars entities, such as the Foundation, from giving tickets to public officials within the State of Arizona any county or any municipality. Other laws provide similar prohibitions on the federal and tribal level. The exceptions are quite narrow and complicated and require a sophisticated working knowledge of the laws to ensure compliance.
- The CFO must review the request to ensure compliance with all federal, state and tribal laws and to ensure that the request complies with the charitable purposes of the Foundation. If so, the CFO will make a written recommendation to the Executive Committee. If not, the CFO will document that the request was denied and why.
- Upon receipt of a recommendation from the CFO, legal counsel selected by the Executive Committee will review the request and provide appropriate legal advice to the Executive Committee with respect to both the issues legal compliance and whether the tickets appear to achieve at least one of the Foundation's charitable purposes.
- After receipt of a recommendation from the CFO and legal advice from legal counsel, the Executive Committee will approve or deny the request. If a request is denied, the Executive Committee will ensure that the reasons for denying the request are documented. Likewise, a written record of the Executive Committee's decision to approve the ticket request with respect to public officials will also be maintained by the CFO.

**General:**

This Policy supplements, amends and updates any and all current or similar policies of the Foundation. To the extent of any inconsistency between this Policy and any existing or prior policies of the Foundation, the terms and conditions of this Policy shall control in all respects.

Adopted: May 5, 2011

Amended: February 10, 2016

Amended: December 13, 2019