**COMPANY TICKET USE POLICY**

An important part of **<**COMPANY>[[1]](#footnote-1)’s Travel & Entertainment Policy <link> is our Ticket Use Policy. It applies to all employees, officers, and directors as well as contractors and temporary employees (hereafter referred to as “qualified parties”). All qualified parties must acknowledge and agree to this policy prior to ordering tickets and scheduling events.

**Business Purpose[[2]](#footnote-2)**

<COMPANY> has invested in tickets and sponsorships of local teams, venues, and events to accomplish three goals[[3]](#footnote-3):

1. Drive business through the relationships we build with clients by helping them experience memorable events.
2. Reward partners and internal teams for outstanding performance.
3. Tickets can be purchased for personal use or given to pre-approved charitable channels.

<COMPANY> tracks data and ticket use to ensure we are achieving these goals while staying compliant. It is critically important that all qualified parties provide accurate data about the events they schedule, including attendee information and business purpose.

All tickets used for business purposes or paid for by COMPANY in full or in part must be entered and tracked in InviteManager. Failure to add tickets and events to InviteManager will prevent qualified parties from obtaining reimbursement and may result in the possible elimination of tickets and events.

**Approval Process**

The approval process includes a two-step process based on the order purpose selected by qualified parties when requesting tickets:

1. Manager or business unit leader will approve or deny request based on the business use case.
2. <COMPANY>’s ticket and events team will approve or deny request based on alignment with company goals and targets.

Approvals are made 1-3 weeks prior to the event to allow time for planning. You can see your pending events, invitations, and real-time updates in the *My Orders* section of InviteManager.

If you work with public entities or officials and plan to invite them to an event, you must use the *Government/Public* order purpose when requesting tickets or space at an event. This will send your request to <COMPANY>’s Legal & Compliance department before entering the main approval process described above. It is very important that all requests which include public entities or official are properly categorized to ensure full regulatory compliance.[[4]](#footnote-4)

All qualified parties must complete the post-event survey in InviteManager within 24 hours after attending their event. This feedback is required to ensure compliance and provide timely feedback to <COMPANY>’s sales, marketing, and finance departments.

**Ownership and Tracking**

<COMPANY> classifies tickets as marketing assets. It is crucial the data we receive in InviteManager is accurate. Because costs are allocated to client or project codes[[5]](#footnote-5), it is imperative qualified parties accurately classify their events in InviteManager. Ticket use is a significant factor in how <COMPANY> classifies business expenses for the purpose of taxation. To ensure these classifications are accurate, it is important that all qualified parties enter timely, accurate data into InviteManager.

**Special Events**

<COMPANY> will occasionally host special events at large national events like the Masters, Super Bowl, or Kentucky Derby. Additionally, we may work with partners to provide special access opportunities for qualified parties including Pit Passes, Suite Passes, Pre-Game Field Passes, and more. InviteManager will host and communicate these special event opportunities.

**Purchasing Tickets & Events**

It is COMPANY policy to use all corporate-owned assets prior to purchasing tickets or events from outside sources. In some cases, however, qualified parties may wish to provide clients with a memorable experience not available within of our available inventory. In such cases, qualified parties can search for additional events in InviteManager.

InviteManager shows tickets from all reputable tickets sources, including Ticketmaster, StubHub, TicketNetwork, and Vivid Seats. Purchase requests from these sources made through InviteManager will follow the same approval process described above. In such cases, qualified parties will need to use their credit card in accordance with <COMPANY>’s T&E policy on the websites of InviteManager partners.

*All tickets requests and purchases must occur in InviteManager. Failure to do so will prevent qualified parties from obtaining reimbursement and may result in the possible elimination of tickets and events.*

**Prohibited Practices**

COMPANY Personal Conduct Policy <link> explicitly prohibits the selling or bartering of tickets or events for personal benefit. Any misrepresentation of ticket or event usage will be immediately addressed per COMPANY Personal Conduct Policy and may result in disciplinary action up to and including termination. COMPANY may randomly contact past event attendees, including clients, to obtain feedback and ensure full compliance with the policies described herein[[6]](#footnote-6).

**The Foreign Corrupt Practice Act (FCPA)**

Qualified parties who work with foreign nationals or clients outside the United States must adhere to the statutes described in the Foreign Corrupt Practice Act (FCPA). The FCPA prohibits influencing individuals and organizations with personal payments, gifts, or other rewards. <COMPANY> strictly adheres to the provisions described in the FCPA. All qualified parties must review the Foreign Corrupt Practice Act by visiting the following link: https://www.justice.gov/criminal-fraud/statutes-regulations.

After reviewing, qualified parties should direct any questions to <COMPANY>’s compliance department: <email>[[7]](#footnote-7).

1. Find and replace “COMPANY” throughout the document with actual company name. Also look out for <> where hyperlinks to company-specific supporting materials are suggested. [↑](#footnote-ref-1)
2. Modify headers and formats as necessary to align with company branding and preferences. [↑](#footnote-ref-2)
3. Modify as necessary to align with company goals. [↑](#footnote-ref-3)
4. Compliance processes may differ from business to business; please modify as necessary to reflect company policies. [↑](#footnote-ref-4)
5. Modify as necessary to reflect company processes. [↑](#footnote-ref-5)
6. Additional examples of prohibited actions may be inserted here [↑](#footnote-ref-6)
7. Replace with compliance contact information [↑](#footnote-ref-7)