



United States Olympic Committee

Code of Conduct

2/1/06



Dear Colleagues:

The mission of the United States Olympic Committee (“USOC”), as articulated in our Mission Statement, helps define a shared set of ethical principles to guide our daily activities.

The USOC’s Mission Statement reads as follows:

To support United States Olympic and Paralympic athletes in achieving sustained competitive excellence and preserve the Olympic ideals, and thereby inspire all Americans.

The Mission Statement is supplemented by the USOC’s Value Statement, which puts forward the following commitments:

As a team, we are committed to:

- Achievement of excellence;
- Honesty, integrity and trustworthiness in all dealings;
- Respect for the rights, differences and dignity of others;
- Accountability and transparency; and
- Stewardship of the Olympic Movement.

Acting ethically and with integrity is a core part of our heritage, our aspirations, and our identity and we believe is both a long-term competitive advantage and a critical aspect of the long-term survival of the Olympic movement in the United States.

As a result, we have a comprehensive, values-based Ethics and Compliance Program, which is a vital part of the way we conduct ourselves at the USOC. Because the Program rests on our Mission Statement and the values underlying our Values Statement, it can easily become incorporated into our daily activities and supports our tradition of caring – for our athletes, member organizations, communities, and colleagues.

In this Code, we define our standards of conduct, which are based on the notions of fair play and good sportsmanship embedded in the principles of Olympism. Clearly, the USOC participates in some complex and highly regulated areas, where governing laws and regulations often change frequently. We also conduct activities in foreign nations, where laws, norms and customs may vary. This document therefore also provides some information aimed at assisting USOC personnel to address such challenges.

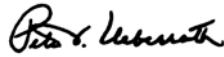
However, no Code can address all the ethical or integrity questions that may confront you. As a result, this Code also has a section about the numerous resources that you can use when you have questions or concerns. These resources range from our confidential ethics Help-Line to your supervisor,

the Ethics Officer, the General Counsel, and Human Resources personnel. Our goal is to address issues before they become serious problems. Compliance with the USOC's ethics and compliance program is essential to the fulfillment of the promise of our future – an organization that can be counted on to do the right thing, and one that generates value for all those connected to us – our employees, those representing the USOC or acting on our behalf, American Olympic athletes, communities, and other stakeholders.

You have our assurance that no retribution for asking questions or raising concerns about the Code or for reporting possible improper conduct will be tolerated. No Code of Conduct can substitute for each person's own internal sense of fairness, honesty, and integrity. Thus, in your daily life and work, if you encounter a situation or are considering a course of action that you are concerned will not reflect on the USOC in the most positive manner or that simply does not feel right, please discuss the situation with any of the resources mentioned above.

We ask you to assist us and all of our colleagues in this organization in supporting the values and principles that are critical to continuing our tradition of service to America's Olympic and Paralympic athletes and our member organizations.

Sincerely,



Peter V. Ueberroth
Chair



James E. Scherr
Chief Executive Officer

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COMMITMENTS AND RESPONSIBILITIES

Purpose of the Code

Our Code of Conduct provides a set of expectations, a set of rules, and general guidance, and applies to all USOC employees, directors, officers, committee members, volunteers, agents, and representatives of USOC member organizations when dealing with the USOC (collectively “colleagues” or “USOC colleagues”). The Code’s aim is to help ensure that we all carry out our daily activities within appropriate ethical and legal standards. These obligations apply to our relationships with athletes, member organizations and organizations to which we belong, third-party payers, subcontractors, independent contractors, vendors, consultants, governments and the public, and one another. The Code is a critical component of our overall Ethics and Compliance Program and is designed to ensure we meet our ethical standards and comply with applicable laws and regulations.

The Code is intended to be comprehensive and easily understood but it is not intended to be exhaustive or to address everything. In some instances, the Code deals fully with the subject covered. In many cases, however, the subject addressed either has so much complexity or some unique and unanticipated characteristics that additional guidance is needed. To obtain additional guidance, you may utilize the different resources referenced throughout the Code or listed at the end. The standards set forth in the Code are mandatory and must be followed.

Our Code operates in tandem with the policies and procedures of our organization and with all applicable U.S. and foreign laws and

regulations. Where differences exist because of local customs, norms, laws and regulations, we ask our colleagues to use the highest standard of behavior or the most restrictive requirement that applies.

USOC Responsibilities

The USOC seeks to provide a work environment where high standards of ethical behavior are recognized, rewarded, and practiced. In order to accomplish this goal, the USOC will:

- Ensure that every colleague is aware of, understands, and lives up to our Code,
- Provide colleagues with appropriate training on our Standards, policies and procedures and relevant laws and regulations, and
- Provide safe and confidential resources for colleagues to seek advice on proper workplace conduct and to report issues and concerns.

Colleague Responsibilities

USOC colleagues are expected to comply with both the letter and the spirit of our Code, organization policies and procedures, and the laws and regulations that govern our organization. We ask each colleague to:

- Read and understand our Code;
- Follow the Code, and abide by all applicable USOC policies and procedures and U.S. and foreign laws and regulations;
- Be alert to any situations that could violate our Code or policies; and
- Report suspected violations, issues and concerns to your supervisor or any of the many resources identified on page 21 of this booklet.

Colleagues are not expected to know the answer to each and every question or how to apply every organization requirement to

complex and often unique situations. Colleagues are expected, however, to seek advice or clarification promptly when they are uncertain about proper actions or practices. Remember -- when in doubt, ask for help!

Colleagues may report questions, suspected violations of the Code, and concerns to their supervisor or manager, organization legal counsel, the Ethics Officer, or any other resource available. Colleagues may also report concerns to the USOC's Ethics Help-Line, an independent 24-hour telephone service available to all USOC colleagues. Reports to the Ethics Help-Line may be made anonymously. These anonymous reports are monitored by management and the Ethics and Audit Committees.

Management's Responsibilities

USOC officers, directors, managers and supervisors have a special responsibility to set an example by exhibiting the highest standards of behavior. They must also:

- Ensure that each colleague knows and understands the Code and relevant organization policies and procedures and how to apply them;
- Demonstrate in words and deeds a commitment to the USOC's Code;
- Make sure colleagues understand that nothing is more important than ethical business conduct and compliance with policies and procedures, laws and regulations;
- Encourage colleagues to seek advice or help and to report suspected violations without fear of punishment or reprisal;
- Provide appropriate resources to answer colleagues' questions; and
- Make themselves approachable and available to *all* colleagues.

Commitments to Our Stakeholders

We affirm the following commitments to the USOC's stakeholders:

To the American people: we are committed to supporting United States Olympic and Paralympic athletes to achieve sustained competitive excellence and preserve the Olympic ideals, and thereby inspire all Americans.

To our athletes: we are committed to assisting athletes in their quest to realize their Olympic and Paralympic dreams and to achieve competitive excellence in a fair competitive environment.

To our coaches: we are committed to assisting coaches to enable athletes to achieve competitive excellence in their efforts to realize their Olympic and Paralympic dreams.

To our National Governing Bodies: we are committed to assisting National Governing Bodies to enable athletes to realize their Olympic and Paralympic dreams, to be effective governing bodies for sport in the United States and the Olympic and Paralympic movement, and to achieve sustained competitive excellence.

To our other member organizations: we are committed to enabling our other member organizations to realize the benefits of participating in the Olympic and Paralympic movements in the United States.

To our communities: we are committed to being a positive contributor to the communities in which we operate.

To our employees: we are committed to providing an equal opportunity work environment where everyone is treated with dignity and respect.

THE CODE

RESPONSIBLE CARE

All USOC operations are to be conducted in a manner that protects the health and safety of our colleagues and all people in the communities where they operate, and that follows all applicable rules and laws.

LEADERSHIP RESPONSIBILITIES

All USOC colleagues are obligated to follow our Code. However, we expect everyone in the organization with supervisory responsibility to exercise that responsibility in a manner that is kind, sensitive, thoughtful, and respectful. We expect each supervisor to create an environment where all team members feel free to raise any concerns and/or new ideas regarding the USOC's Code of Ethics and its Ethics and Compliance program. We also expect that supervisors will ensure those on their team have sufficient information to comply with laws, regulations, and policies, as well as the resources to resolve ethical issues. They must help to create a culture within the USOC that promotes the highest standards of ethics and compliance. This culture must encourage everyone in the organization to share concerns with appropriate personnel when they arise. We must never sacrifice ethical and compliant behavior in the pursuit of other organizational objectives. Specific guidance for leaders throughout the organization regarding their responsibilities under our Ethics and Compliance Program is included in a supplement for leaders to this Code. Leaders at all levels of the organization should use that guidance to most effectively incorporate ethical behavior and compliance into all aspects of our organization.

WORKPLACE CONDUCT

Open Communications

Open and honest communication is one of the cornerstones of a productive business environment. At the USOC we put a premium on communication that encourages new ideas and participation at *all levels* of the organization.

Every USOC colleague is encouraged to contribute. We can *all* suggest changes and refinements to our business practices that result in better work product, reduced costs or enhanced service to our customers.

Effective communication is a product of listening as well as talking. USOC colleagues are encouraged to listen first, and then ask questions, discuss options and make informed decisions that incorporate appropriate input from all applicable organizational units.

We must all work diligently to create an environment where asking questions and challenging the status quo is encouraged and rewarded.

Legal and Regulatory Compliance

The USOC provides varied services in many states. In all cases, these services are provided within appropriate federal, state, and local laws and regulations. Such laws, regulations, and conditions of participation vary tremendously. We have developed policies and procedures to address many legal and regulatory requirements. However, it is impractical to develop policies and procedures that encompass the full body of applicable law and regulation. Obviously, those laws and regulations not covered in organization policies and procedures must be followed. There is a range of expertise within the organization, including counsel and numerous

functional experts, who should be consulted for advice concerning human resources, legal, and regulatory requirements. Anyone aware of violations or suspected violations of laws or regulations, or organization policies and procedures must report them immediately to a supervisor or member of management, the Human Resources Division, the Legal Affairs Division, the Ethics Officer, or the USOC Ethics Help Line.

Conflicts of Interest

A conflict of interest may occur when outside activities or personal interests interfere with or influence, or appear to interfere with or influence, your ability objectively to perform your job or to act or be perceived as having acted in the best interests of the USOC. A conflict of interest may also exist if the demands of any outside activities hinder or distract a colleague from the performance of their job or cause the individual to use USOC resources for other than USOC purposes. All financial, business, and other activities both inside and outside your job must be lawful and free of conflicts or even the suggestion of a conflict with your responsibilities as a colleague of the USOC.

Examples of potential conflicts of interest include:

- Having a financial interest in a customer's private company or business;
- Serving as a board member of any organizations with ideals that conflict with the USOC's ideals or mission, or serving in a role that decides whether or how another organization does business with the USOC;
- Hiring or supervising a relative or cohabitant or determining or influencing their promotions or pay raises;
- Serving as a member of the International Olympic Committee and as a member of the USOC Board of Directors, without recusing

oneself when issues related to the USOC's business relationships with the IOC are discussed in Board meetings;

- Hiring a vendor or supplier managed by a family member, relative or close friend; and
- Receiving discounts or personal gifts from actual or potential suppliers or customers with a value in excess of \$100.00.

Colleagues are encouraged to participate in professional organizations and community activities but your participation must not jeopardize the USOC's reputation or distract from the performance of your job.

Relationships with Vendors and Suppliers

At the USOC, supplier and vendor relationships are managed in a fair, equitable and ethical manner consistent with our Code and all applicable laws and regulations and good business practices.

Wherever, practical, the USOC provides a competitive opportunity for suppliers and vendors to earn a share of our purchases, and we enlist their active support in ensuring that we meet customer expectations regarding quality, cost and delivery.

Decisions to hire a vendor or supplier or to source materials from a particular vendor or supplier are made on the basis of objective criteria such as quality, reliability, technical, excellence, price, delivery, service and maintenance of adequate sources of supply. Purchasing decisions must never be made on the basis of personal relationships and friendships or the opportunity for personal gain, financial or otherwise.

All USOC colleagues must respect the terms of supplier contracts and licensing agreements and maintain open, honest dialogue consistent with good business practices. Colleagues

must also safeguard all information received from a vendor or supplier, including pricing, technology and proprietary design information, and not disclose it to anyone outside of the USOC without the supplier or vendor's or supplier's written permission.

Use of Organization Resources

It is the responsibility of each USOC colleague to protect and preserve the organization's resources. USOC resources include such things as company time, materials, supplies, equipment, information, electronic mail and computer systems. These resources are provided to colleagues to fulfill the organization's goals and purposes and are to be maintained and used for USOC-related purposes only. As a general rule, the personal use of any USOC asset without prior supervisory approval is prohibited. The occasional use of items, such as copying facilities or telephones, where the cost to the USOC is insignificant, is permissible.

Personal use that is excessive or violates other organization policies is prohibited unless supervisory approval is received in advance of use. Some examples include:

- Excessive calling or faxing long-distance;
- Extensive photocopying;
- Copying computer software programs (except as authorized by licensing agreements);
- Bringing office supplies home for personal use;
- Driving or using a USOC vehicle, tools, equipment, or other USOC assets without authorization; and
- Using electronic networks, including the Internet, except as authorized by USOC policy.

The use of USOC resources for personal financial gain is strictly forbidden.

Notwithstanding the foregoing sentence, using the USOC's provided employee bulletin board is permitted if the USOC-provided guidelines for postings thereon are followed.

USOC colleagues should report any improper use of organization resources to their manager or supervisor, the Human Resources Division, the Ethics Officer, or the Help-Line. By limiting use of USOC resources to USOC purposes, colleagues assist in the USOC's continuous efforts to control costs.

BUSINESS COURTESIES—GIFTS AND ENTERTAINMENT—GENERALLY, GIVING AND RECEIVING, RELATIONS AMONG COLLEAGUES, AND GOVERNMENT EMPLOYEES

General

This section of the Code should not be considered in any way as an encouragement to make, solicit, or receive any type of entertainment or gift. This section of the Code applies to the giving and receiving of gifts by or to colleagues and their spouses and immediate family members.

This section of the Code, while generally complete, does not and is not intended to address every possible pattern of conduct. In cases where a colleague has a question or concern about application of this section of the Code to the giving or receiving of a gift, the colleague should discuss that concern or question with the Ethics Officer.

Receiving Business Courtesies

There will be times when a current or potential business associate may extend an invitation to attend a non-business, social event in order to further develop a business relationship. USOC colleagues may accept

such invitations, provided: (1) the cost associated with such an event is reasonable and appropriate, which, as a general rule, means the cost will not exceed \$100.00 per person; (2) no expense is incurred for any travel costs (other than in a vehicle owned privately or by the host entity) or overnight lodging; and (3) such events are infrequent. Prior to accepting invitations to opportunities that include travel and overnight accommodations at reduced or no cost to a colleague or the USOC, consult our policies and seek appropriate approvals from your supervisor. USOC colleagues may accept gifts with a total value of \$100.00 or less in any one year from any individual or organization who has a business relationship with the USOC.

Perishable or consumable gifts may only be given to a department or group, as opposed to an individual, are not subject to any specific limitation other than reasonableness and the prohibition against the receipt of lavish gifts. USOC 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).

Under no circumstances may a USOC colleague solicit a gift.

Extending Business Courtesies

There may be times when a colleague wishes to extend to a current or potential business associate an invitation to attend a social event (*e.g.*, reception, meal, sporting event, or theatrical event) to further or develop a business relationship. The purpose of the entertainment must never be to induce any favorable business action. During these events, topics of a business nature must be discussed and the host must be present. The cost associated with such an event must be reasonable and appropriate. As a general rule,

this means the cost will not exceed \$100.00 per person. 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. All such business entertainment must comport with the code of conduct or code of ethics of the recipient's organization, and it must be covered by the appropriate USOC budget.

The organization will under no circumstances permit or authorize participation in any business entertainment that might be considered lavish.

Gifts to business associates who are not government employees must not exceed \$100.00 per year per recipient absent approval of the Ethics Officer or Ethics Committee Chair. USOC colleagues may give gift certificates within the limits of this section of the Code, but may never give cash or financial instruments (*e.g.*, checks, stocks). The corporate policy on business courtesies permits occasional exceptions to the \$100 limit to recognize the efforts of those who have spent meaningful amounts of volunteer time on behalf of the USOC, provided such expenditures have been approved by the Ethics Officer or Ethics Committee Chair.

Relationships Among USOC Colleagues

In the normal day-to-day functions of an organization like the USOC, there are issues that arise which relate to how people in the organization should deal with one another. It is impossible to foresee all of these, and many do not require explicit treatment in a document like this. A few routinely arise, however.

One involves gift giving among colleagues for certain occasions. While we wish to avoid

any strict rules, no one should ever feel compelled to give a gift to anyone or receive a gift from anyone, and any gifts offered or received should be appropriate to the circumstances. A lavish gift to anyone in a supervisory role would clearly violate this Code.

Another situation, which routinely arises, is a fund-raising or similar effort undertaken by individual colleagues, in which no one should ever be compelled to participate and there should be no workplace consequences of non-participation. Similarly, when the USOC or a USOC facility determines to support charitable organizations, such as the United Way, no colleague should be compelled to contribute to the charitable organization, nor should there be any workplace consequences of such non-participation.

Gifts to Government Employees

The giving of gifts to US and state 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 Government Relations or Legal Affairs Divisions.

USOC INFORMATION

Books, Records and Communications

Each USOC colleague is responsible for the integrity and accuracy of organization documents, communications and financial records. These records serve as a basis for managing our activities and are important in meeting our obligations to vendors, sponsors, government regulators, creditors, the Board, and our athletes.

All financial information must reflect actual transactions and conform to generally accepted accounting principles. The USOC maintains a system of internal controls to assure appropriate authorization, recording and accountability of the USOC's assets. When colleagues are asked to respond to requests by internal auditors, legal staff, independent accountants, the Board, and outside counsel, that response must be complete and truthful. Colleagues must include all relevant information, even if the request does not specifically ask that that be done.

It is a violation of the Code to alter or falsify information on any record or document, to intentionally make a false or exaggerated claim to anyone, or to mislead anyone about what we do.

Organization documents and records are retained in accordance with the law and our own record retention policies. Documents include paper documents, voice mail, and computer-based information such as E-mail, computer files on disk or tape, and any other medium that contains information about the organization or its activities. Colleagues are prohibited from tampering with these documents or removing or destroying them prior to the dates specified in our retention policies. No one may alter or falsify information on any record or document. Records must never be destroyed in an effort to deny governmental authorities information that may be relevant to a government investigation or in an effort to deny other parties in a litigation against the USOC information that may be relevant to the litigation. Additionally, no one may remove or destroy records prior to the specified date without first obtaining permission as outlined in the USOC's records management policy.

We exercise due care and due diligence in maintaining the confidentiality, availability and integrity of information assets the USOC owns or of which it is the custodian. Because so much of our organization information is generated and contained within our computer systems, it is essential that each USOC colleague protect our computer systems and the information contained in them by not sharing passwords and by reviewing and adhering to our information security policies and guidelines.

Colleagues must not discuss with any unauthorized person inside or outside of the USOC any information that is confidential and not publicly available. Examples of such confidential information include:

- Undisclosed financial and earnings reports;
- Confidential sponsor information;
- Business plans;
- Capital requirements;
- Personnel or salary information or changes relating to employees other than oneself;
- Confidential technical data;
- Marketing, pricing, or service strategies;
- Business negotiations;
- Business costs and volumes;
- Supplier and vendor information; and
- Proprietary technology.

Colleagues should be cautious about discussing USOC activities with authorized USOC colleagues in the presence of, or within hearing distance of, unauthorized personnel. This includes family and friends, who may inadvertently disclose confidential information to others.

If an individual's employment or contractual relationship with USOC ends for any reason, the individual is still bound to maintain the confidentiality of information viewed, received or used during the employment or contractual relationship with the USOC. This

provision does not restrict the right of a colleague to disclose, if they wish, information about their own compensation, benefits, or terms and conditions of employment.

Intellectual Property

Intellectual property laws provide an incentive for the creative efforts and research and development that support innovation. Intellectual property consists of tangible products of the mind such as concepts, information, symbols, and expressions that are protected by law. The protection provided by these laws makes it feasible for organizations like the USOC to invest in the commercialization of new ideas and processes.

At the USOC, we must vigorously protect our own intellectual property rights as well as rights of others. Intellectual property rights include patents, copyrights, trademarks, and trade secrets. Property rights also include software programs created by us or other companies that are copyrighted, are trade secrets, or are otherwise restricted.

To protect our own property rights, USOC colleagues should fully document product development research and use appropriate USOC trademark and copyright notices on all correspondence, articles, manuals or other papers. Colleagues should also avoid disclosing proprietary and confidential information outside of the USOC unless there is a clear business purpose and the recipient has signed a confidentiality agreement.

To avoid infringing on the intellectual property rights of others, USOC colleagues should not:

- Make unauthorized copies of software or photocopy magazine/journal articles or other publications;
- Hire another organization's employee to obtain that company's trade secrets or confidential information;
- Affix another's trademark to goods without authorization; and
- Erroneously allege patent infringement or mark a product with an untrue patent notice.

If the USOC or its colleagues want or need to use intellectual property belonging to someone else, we must obtain a license to use the property or purchase the outright ownership of the property. In the case of property rights with an expiration date, such as patents, USOC colleagues must be sure that this date has passed if licensing or outright purchase is not feasible.

Computer Networks and Information

All communications systems, including but not limited to electronic mail, Intranet access, Internet access, telephones, and voice mail, are the property of the organization and are to be used primarily for business purposes in accordance with electronic communications policies and standards. Limited reasonable personal use of USOC communications systems is permitted; however, users should assume these communications are not private. Users of computer and telephonic systems should presume no expectation of privacy in anything they create, store, send, or receive on the computer and telephonic systems, and the USOC reserves the right to monitor and/or access communications usage and content consistent with USOC policies and procedures.

Colleagues may not use internal communication channels or access to the Internet at work to post, store, transmit, download, or distribute any threatening

materials; knowingly, recklessly, or maliciously false materials; obscene materials; or anything constituting or encouraging a criminal offense, giving rise to civil liability, or otherwise violating any laws. Additionally, these channels of communication may not be used to send chain letters, personal broadcast messages, or copyrighted documents that are not authorized for reproduction. Colleagues who abuse our communications systems or use them excessively for their personal purposes may lose these privileges and be subject to further disciplinary action.

The USOC's computer networks and information resources include our electronic mail and messaging systems, internal Intranet and the use of the following external computer-based services when accessed through the USOC's systems

- External, third party electronic mail and messaging systems;
- The public Internet;
- The World Wide Web;
- Third party, computer-based on-line services; and
- Electronic bulletin board systems.

Use of the USOC information networks and resources is both a necessity and a privilege. Colleagues with access to our networks are responsible for using the highest standards of organizational and social behavior in all of their usage and communications. Colleagues who use the USOC's networks from remote locations (e.g., home or other non-USOC locations) are subject to the same standards of use as are colleagues who use USOC networks on USOC premises.

The USOC computer networks are for legitimate USOC-related business purposes only. Limited personal use may be acceptable if such use is authorized and does not interfere

with the performance of the colleague's normal responsibilities.

Colleagues may not use the USOC's networks for any of the following:

- Soliciting for commercial, religious, or political causes;
- Sending chain mail letters or broadcast personal messages;
- Sending inappropriate, offensive or disruptive messages;
- Gaining unauthorized access to databases or information sources at the USOC or any other site;
- Damaging computer equipment, software or data; and
- Interfering with or disrupting network users, services or equipment.

The following activities are highly inappropriate and strictly forbidden; in certain situations, they may also be illegal and subject the USOC and the individual(s) involved to litigation and possible civil and/or criminal sanctions:

- Sexually-related or pornographic messages or material;
- Violent or hate-related messages or material;
- Bigoted, racist or other offensive messages aimed at a particular group or individual;
- Gambling online or by email;
- Malicious, libelous or slanderous messages or material; and
- Subversive or other messages or material related to illegal activities.

The USOC reserves the right to periodically monitor, access and disclose the contents of USOC computer systems and networks and to block access to non-work-related Internet sites. Colleagues who repeatedly or seriously misuse USOC networks are subject to

discipline including possible termination of employment.

FINANCIAL REPORTING AND RECORDS

We have established and maintain a high standard of accuracy and completeness in documenting, maintaining, and reporting financial information. This information serves as a basis for managing our activities and is important in meeting our obligations to our colleagues and stakeholders. It is also necessary for compliance with tax and financial reporting requirements. All financial information must reflect actual transactions and conform to generally-accepted accounting principles. All funds or assets must be properly recorded in the books and records of the USOC. The USOC maintains a system of internal controls to provide reasonable assurances that all transactions are executed in accordance with appropriate authorization and are recorded in a proper manner so as to maintain accountability of the organization's assets. We diligently seek to comply with all applicable auditing, accounting and financial disclosure laws. Senior financial officers receive training and guidance regarding auditing, accounting and financial disclosure relevant to their job responsibilities. They are also provided the opportunity to discuss issues of concern with the Board of Directors' Audit Committee. Anyone having concerns regarding questionable accounting or auditing matters should report such matters to the Board of Directors' Audit Committee by calling the USOC Ethics Help Line at 1-877-404-9935.

EMPLOYMENT PRACTICES

Diversity and Equal Employment Opportunity

One of the USOC's strengths is the diversity of its colleagues. The USOC is committed to

maintaining a diverse workforce, where employees are hired, retained, compensated, disciplined, and promoted based on their contribution to the USOC.

Federal and state equal employment opportunity laws prohibit employment discrimination based on race, color, religion, sex, age, national origin, citizenship status, veteran status, and disability. In some states, or some counties, laws prohibit discrimination on the basis of sexual orientation. The USOC is committed to providing an equal opportunity work environment not only to be in full compliance with all applicable laws but also to realize the USOC's mission, vision, and values.

Our colleagues provide us with a wide complement of talents that contribute greatly to our success. We are committed to providing an equal opportunity work environment where everyone is treated with fairness, dignity, and respect. We comply with all laws, regulations, and policies related to non-discrimination in all of our personnel actions. Such actions include hiring, staff reductions, transfers, terminations, evaluations, recruiting, compensation, corrective action, discipline, and promotions. No one shall discriminate against any individual with regard to race, color, religion, sex, national origin, age, disability, sexual orientation, or status as a veteran with respect to any offer, term, or condition of employment. We make reasonable accommodations to the known physical and mental limitations of otherwise qualified individuals with disabilities when such accommodations are necessary for the individual to perform their job functions.

All USOC colleagues deserve to be treated with dignity, fairness, and respect. Accordingly, colleagues must avoid jokes and actions or statements about individuals or

groups that may be interpreted as discriminatory or harassing or that stereotype any group of individuals. Supervisors and managers have a special responsibility to consistently adhere to and apply USOC's policies regarding equal employment and harassment and be able to show non-discriminatory reasons for taking personnel actions.

Commitment to Diversity

The USOC is a performance-based organization providing equal opportunities for all who perform and we actively seek to include diversity in the US Olympic family. This commitment to diversity applies to all who are in a position to make decisions about including individuals in all facets of the US Olympic movement.

We respect and value the individuality of all colleagues. We know that valuing diversity makes good common sense, is a vital part of accomplishing our mission, and helps to ensure our future success. Committing to diversity is good for the US Olympic family, is consistent with the principles of Olympism, and is the right thing to do. We view diversity as a tool for increasing the effectiveness of the USOC and its member organizations and as critical to our success.

Our integrity demands impartiality and respect of all people with whom we come in contact, regardless of gender, race, ethnicity, age, religion, sexual orientation, or other characterization. Because of the breadth of our work and the national and international reach of what we do, we understand the importance and contribution of diversity and we commit to recognize and increase diversity in all of our endeavors and at all levels of the organization. Management is required to report annually to the USOC Board of Directors on its efforts and progress in

achieving greater diversity of our workforce, member organizations, and other stakeholders.

We define diversity as individuality. This individuality may include a wide spectrum of attributes like personal style, age, race, gender, ethnicity, sexual orientation, language, physical ability, religion, family, citizenship status, socio-economic circumstances, education, and life experiences. To us, diversity is any attribute that makes an individual unique that does not interfere with effective job performance.

We demonstrate our commitment to diversity in the following ways:

We seek a diverse workforce and take steps to accomplish that. We recruit employees in a manner designed to maximize the exposure of our job openings to diverse populations. We seek out a diverse Board of Directors and leadership in our constituent organizations.

We seek out diverse team leaders, coaches, administrators, and officials to work with our diverse athlete population. We seek to include a diverse pool of athletes who can later become Olympic hopefuls. We embrace the unique capabilities and perspectives of individuals. We respect our colleagues by listening and responding to their diverse needs.

We retain a diverse workforce by ensuring that colleagues are rewarded for their contributions to the organization. We work with our member organizations to ensure that they share our commitment to diversity. We work with diverse suppliers to address our diverse needs.

We do all of this so that our organization and the US Olympic family reflect the diversity of the stakeholders we serve.

Harassment and Workplace Violence

Any form of illegal harassment or any other illegal conduct that interferes with an individual's work performance or creates an intimidating, hostile, or offensive work environment, will not be tolerated.

Illegal harassment takes many forms. It may target an individual's race, sex, religion, color, national origin, age, mental or physical disability or sexual orientation. It may also target a person who is speaking out against illegal discrimination or participating in proceedings under anti-discrimination laws. Each USOC colleague has the right to work in an environment free of illegal harassment and disruptive behavior. We do not tolerate illegal harassment by anyone based on the diverse characteristics or cultural backgrounds of those who work with us. Degrading or humiliating jokes, slurs, intimidation, or other harassing conduct is not acceptable in our workplace.

Sexual harassment is prohibited. This prohibition includes unwelcome sexual advances or requests for sexual favors in conjunction with employment decisions. Moreover, verbal or physical conduct of a sexual nature that interferes with an individual's work performance or creates an intimidating, hostile, or offensive work environment has no place at the USOC.

Illegal harassment also includes incidents of workplace violence such as assault and intimidation. Assault may be verbal, such as yelling or screaming. Intimidation can range from threatening body language to threatening letters. Workplace violence includes robbery and other commercial crimes, stalking, violence directed at the employer, terrorism, and hate crimes committed by current or former colleagues.

Intimidation of any kind will not be tolerated. Colleagues are prohibited from any act of violence or intimidation and may not possess firearms, other weapons, explosive devices or dangerous materials in the workplace, in any job-related activity outside the workplace, or in any vehicles on USOC premises.

Illegal harassment can exist at any level of the organization, between coworkers, between supervisors and employees, and between customers, contractors or vendors and colleagues. No matter where it exists or who it involves, illegal harassment is strictly prohibited and violations will result in disciplinary action up to and including termination of employment. In some cases, there could be further legal implications involving fines.

As a colleague, you or a coworker may at some time be confronted with or witness harassment or intimidation. If so, it is important that you tell the offending person to stop the unwanted behavior as soon as it occurs. Remain calm and if the situation warrants, remove yourself from the presence of the individual. It is critical that you immediately report the behavior to your supervisor, your Division Head or the Human Resources Division. Allegations of harassment and intimidation are taken seriously and will be promptly investigated. The USOC will take immediate steps to prevent and correct any instances of illegal harassment in the workplace or in settings in which employees may find themselves in connection with their employment.

Colleagues who observe or experience any form of harassment or violence should report the incident to their supervisor, the Human Resources Division, the USOC Employee Call Line at 719-866-2255, a member of management, the Ethics Officer, or the USOC Ethics Help Line at 1-877-404-9935.

Employee Health and Safety

All USOC facilities comply with all government regulations and rules, USOC policies, and required facility practices that promote the protection of workplace health and safety. Workplace health and safety requirements are established by law. The U.S. Occupational Safety and Health Act requires all employers to furnish a workplace free of recognized hazards, and through the Occupational Safety and Health Administration (OSHA), has established numerous standards that identify workplace hazards and specify methods that employers must take to minimize these hazards.

The USOC is committed to compliance with these standards and closely monitors its workplaces to determine if equipment, machinery and facilities meet specified safety standards and that safety and health hazards are adequately addressed through appropriate work practices and procedures.

In addition, the USOC:

- Provides employees with proper tools and training;
- Provides and enforces the use by all employees of appropriate personal protective equipment;
- Obtains immediate and appropriate medical attention for employees where needed;
- Does not ask or allow any employee to bypass an established safety practice or procedures; and
- Does not ask or allow any employee to disable, tamper with, or defeat any safety device on equipment or machinery.

Safety is everyone's responsibility. All USOC employees must help to create a safe work environment and clearly understand their role in following proper procedures. Colleagues must become familiar with and understand

how these policies apply to their specific job responsibilities and seek advice from their supervisor whenever they have a question or concern. It is important that each colleague immediately advise their supervisor or the Human Resources Division of any serious workplace injury or any situation presenting a danger of injury so timely corrective action may be taken to resolve the issue.

Substance Abuse and Mental Acuity

The USOC forbids the use of alcohol and other controlled substances by USOC employees or employees of a contractor on USOC property conducting normal work activities. For certain USOC events or social functions, alcohol may be permitted at the function by the CEO or his or her designee.

In addition, no USOC employee or any employee of a contractor may report to work or perform any job duties while under the influence of alcohol or any illicit controlled substance. Alcohol and substance abuse by an employee can endanger the employee's safety, the safety of other employees and the community. To protect the interests of our colleagues, we are committed to an alcohol and drug-free work environment. All colleagues must report for work free of the influence of alcohol and illegal drugs. Reporting to work under the influence of any illegal drug or alcohol; having an illegal drug in the colleague's system; or using, possessing, or selling illegal drugs while on USOC work time or property may result in immediate termination.

It is also recognized individuals may be taking prescription or over-the-counter drugs, which could impair judgment or other skills required in job performance. Colleagues must report for work free from impairment of their judgment or other required job skills by prescription or over-the-counter drugs.

Colleagues with questions about the effect of such medication on their performance or who observe an individual who appears to be impaired in the performance of their job must immediately consult with their supervisor.

The USOC may offer assistance to employees who develop problems related to alcohol or substance abuse before the abuse results in harm to others, impairs their job performance or renders them unemployable. Employees who refuse to participate in an appropriate treatment program may be subject to discipline including discharge.

Where appropriate and allowable by law, the USOC may institute drug-testing programs to assure that employees comply with our alcohol and substance abuse policies.

Smoking on USOC premises is permitted only in accordance with published USOC guidelines, which will comport with applicable law.

Controlled Substances, Anti-Doping, and Medical Waste

Some of our colleagues routinely have access to prescription drugs, controlled substances, and other medical supplies. Many of these substances are governed and monitored by specific regulatory organizations and must be administered by physician order only. Prescription and controlled medications and supplies must be handled properly and only by authorized individuals in order to minimize risks to us and to patients. Some of our colleagues interact with athletes and coaches. In interacting with athletes and coaches, our colleagues must not suggest, encourage, advise, or condone the use of substances or methods that are prohibited under the World Anti-Doping Code or other applicable anti-doping rules or regulations governing Olympic sports. Some of our colleagues are

routinely involved in the handling or disposal of medical waste. All colleagues must take steps to ensure that medical waste is disposed of properly as required by law or other regulation. If one becomes aware of inadequate security of drugs or controlled substances, the diversion of drugs from the organization, the administration of prohibited substances or methods in violation of the World Anti-Doping Code or other rules or regulations governing Olympic sports, or inappropriate disposal of medical waste, the incident must be reported immediately to the Human Resources Division, the Sports Medicine Division, or the Legal Affairs Division.

Environmental Compliance

It is our policy to comply with all environmental laws and regulations as they relate to our organization's operations and we operate each of our facilities with the necessary permits, approvals, and controls. We diligently employ the proper procedures to provide a good environment of care and to prevent pollution.

In helping the USOC comply with these laws and regulations, all USOC colleagues must understand how their duties may impact the environment, adhere to all requirements for the proper handling of hazardous materials, and immediately alert supervisors or other appropriate personnel to any situation regarding the discharge of a hazardous substance, improper disposal of hazardous and medical waste, or any situation which may be potentially damaging to the environment.

Hiring of Former and Current Government Employees

The recruitment and employment of former or current U.S. government employees may be impacted by regulations concerning conflicts

of interest. Colleagues should consult with the Human Resources Division or the General Counsel's Office regarding such recruitment and hiring.

MARKETING PRACTICES

Marketing and Advertising Generally

We may use marketing and advertising activities to educate the public, provide information, increase awareness of what we do, and to recruit colleagues. We may authorize others to use marketing and advertising activities to promote their affiliation with us. We present or approve only truthful, fully informative, and non-deceptive information in these materials and announcements.

Antitrust and Unfair Trade Practices

The USOC will conduct its business affairs fairly and in accordance with all applicable policies, laws, and regulations.

Although the USOC is a federally-chartered organization with certain privileges granted by the U.S. Government, it must still be sensitive to the antitrust laws, particularly because it deals with various private enterprises that compete with one another. It is important that such dealings be on a strictly bilateral basis because arrangements/negotiations with more than one competing enterprise on the same subject matter may implicate the very strict prohibitions in the antitrust laws against price fixing, market allocations and/or refusals to deal. No such arrangements or negotiations may occur without prior consultation with the Legal Division.

Information About Others

Learning about our current or potential partners is good practice, but it must be done

fairly and ethically and in compliance with all applicable U.S. federal, state and foreign laws and regulations.

USOC colleagues should seek information about others only when there is a reasonable belief that both the receipt and the use of the information is lawful.

Information that is drawn from published sources or that is otherwise widely available is known as “public information” and may be acquired and used lawfully. USOC colleagues may lawfully gain access to or use proprietary information belonging to others under the following circumstances:

- By deriving information from public sources;
- By observing items in public use and deriving information from such use;
- By obtaining a license, permission, or authorization to receive or use the information;
- By purchasing the outright ownership of the information; and
- By lawfully obtaining and deriving information through reverse engineering.

Colleagues must *never* try to obtain or be willing to accept improperly obtained non-public information about others. USOC colleagues should *never*:

- Obtain proprietary information by means of theft, bribery or misrepresentation;
- Hire someone else’s employee for purposes of improperly obtaining confidential or proprietary information;
- Induce or coerce a person to provide confidential information in exchange for gifts, job offers, or the withholding of the same;
- Copy, duplicate, draw, photograph or otherwise convey someone else’s proprietary information;

- Knowingly be in a restricted area of another entity’s premises without authorization;
- Gather information from another organization or individual through invasive means (e.g., wiretapping, “hacking into” a computer system);
- Acquiring information in violation of a contract between the USOC and another party;
- Obtain proprietary information accidentally misplaced or left in an unsecured place or medium; and
- Employ an intelligence-gathering firm to collect proprietary or confidential data while misrepresenting themselves or the purpose of the data collection.

INTERNATIONAL ACTIVITIES

International Customs, Laws and Regulations

We must be aware that many of the countries in which we conduct our activities have different laws and customs. Colleagues who engage in international activities are responsible for knowing and complying with both the laws and regulations of the countries in which we operate and the U.S. laws and regulations that apply outside U.S. borders. For example, the Foreign Corrupt Practices Act, as well as the laws of most other countries, prohibit giving anything of value to foreign government officials or their families to influence decisions. The USOC will strictly comply with all such laws.

In some situations, U.S. law may conflict with local customs or local law may be more restrictive than U.S. laws or organization policy. If you ever encounter this, follow the more restrictive law, custom, or policy. Contact the Legal Affairs Division for further information and guidance.

The Foreign Corrupt Practices Act

The Foreign Corrupt Practices Act (FCPA) makes it a crime for the USOC, or any of its colleagues, directly or indirectly to offer or pay a bribe to a foreign official. The term “foreign official” refers to any person acting in an official capacity on behalf of a foreign government, agency, department or instrumentality, a foreign government-owned corporation or a foreign political party. The term also applies to any candidate for foreign political office. The FCPA requires us to exercise care in our dealings with foreign government officials, employees, or representatives; and members of their families. Political contributions to foreign government candidates may also be prohibited by the FCPA. Under the FCPA, the USOC is responsible for the actions of its agents and representatives, and its colleagues.

If the USOC cannot obtain a contract without paying a bribe or the equivalent of a bribe, USOC colleagues should report the matter to their supervisor and the Legal Affairs Division and must walk away from the deal. USOC colleagues should be alert to a possible FCPA violation if any of the following occur:

- Unexplained large expenses on a travel and entertainment expense report;
- An agent demanding a higher than normal commission for a transaction;
- Any agent who says they are working with a government official to give the USOC the contract; and
- A request that a commission be paid in another name, in a third country, or to a bank account that does not appear to be identified as the usual or proper bank account for the transaction.

Before offering anything of value to foreign government officials, employees or representatives or a member of their family,

USOC colleagues must obtain advice from their supervisor and the Legal Affairs Division.

Agents, Consultants and Third Party Representatives

The acts of the USOC’s agents, consultants, independent contractors and representatives to facilitate organization activities are considered the acts of the USOC. In other words, the USOC cannot use agents or representatives to do indirectly what we could not do directly. USOC colleagues must abide by all laws in spite of customs, cultural norms, or competitive pressures that suggest otherwise.

It is incumbent on all USOC colleagues to exercise due diligence when selecting a third party to represent the USOC. When selecting a third party, consider the following:

- Hire only reputable, qualified individuals or firms;
- Seek the assistance of the Legal Affairs Division in making adequate background checks and verifying business credentials;
- Make sure that compensation is reasonable for the services to be provided; and
- Seek the assistance of the Legal Affairs Division and management if you spot a “red flag”.

Some “red flags” to be alert for are:

- Third parties with family or other relationships that could influence the buying decision;
- Independent contractors or consultants with a reputation for bribes;
- A sales representative or agent who approaches you near the award of a contract and indicates a “special arrangement” with an official; and

- A customer who suggests that a USOC bid be made through a specific agent or representative.

Trade Controls and Export Restrictions

USOC colleagues must comply fully with the laws, regulations and public policy of the United States concerning international trade controls. Our policy prohibits any international transaction that is prohibited by any applicable regulation or law. If you have any questions in this area, you should consult with the Legal Affairs Division.

POLITICAL ACTIVITIES AND CONTRIBUTIONS

The organization and its representatives comply with all federal, state, and local laws governing participation in government relations and political activities. Additionally, USOC funds or resources are not contributed to individual political campaigns, political parties, or other organizations that intend to use the funds primarily for political purposes. Organization resources include financial and non-financial donations, such as using work time and telephones to solicit for a political cause or candidate or the loaning of USOC property for use in the political campaign.

The organization engages in public policy debate only in a limited number of instances where it has special expertise that can inform the public policy formulation process. When the organization is directly impacted by public policy decisions, it may provide relevant, factual information and opinion about the impact of such decisions on it, its member organizations, or amateur or Olympic sports.

It is important to separate personal political activities from your work on behalf of the USOC in order to comply with the appropriate

rules and regulations relating to lobbying or attempting to influence government officials and the restrictions on the USOC's involvement in political activities. No use of organization resources, including fax machines, stationary, or e-mail, is appropriate for personally engaging in political activity. Colleagues may not place or cause to be placed on USOC property or assets political literature, campaign materials, or politically oriented posters, flyers, brochures, electronic documents, or files. A colleague may, of course, participate in the political process on their own time and at their own expense. While doing so, it is important that USOC colleagues not give the impression they are speaking on behalf of or representing the USOC in these activities. Colleagues cannot be reimbursed by the USOC for any personal contributions for such purposes.

At times, the USOC may ask colleagues to make personal contact with government officials or to write letters to present our position on specific issues. In addition, it is a part of the role of some members of USOC management to interface on a regular basis with government officials. If a colleague is making these communications on behalf of the organization, he or she must be certain to be familiar with any regulatory constraints and observe them.

This USOC policy is required by the Ted Stevens Olympic and Amateur Sports Act, the Internal Revenue Code, and other applicable law. Guidance in this area is always available from the Government Relations or Legal Affairs Divisions as necessary.

CONTACT WITH OUTSIDE ATTORNEYS

If an attorney contacts you for any reason regarding the USOC, you should refer him or her to the Legal Affairs Division. You should never answer questions or supply documents

to attorneys outside of the USOC without the prior approval of the Legal Affairs Division. If you receive a summons, legal complaint, subpoena, or other similar legal document concerning the USOC, then you should immediately send that document to and consult with the Legal Affairs Division. The purpose of referring these requests to the Legal Affairs Division is to coordinate and facilitate the process of responding appropriately.

FOLLOWING THE CODE

It is mandatory for all colleagues to follow the Code and to implement all of its provisions that apply to their area of responsibility. In the event that a colleague violates our Code, USOC policies and procedures, or any of the laws and regulations that govern our activities, the USOC will take immediate and appropriate disciplinary action up to and including termination, claims for reimbursement of losses or damages, and civil prosecution. Discipline will be handled fairly and consistently.

USOC'S ETHICS AND COMPLIANCE PROGRAM

PROGRAM STRUCTURE

The Ethics and Compliance Program is intended to demonstrate in the clearest possible terms the absolute commitment of the organization to the highest standards of ethics and compliance. The elements of the program include setting standards (the Code and policies and procedures), communicating the standards, providing a mechanism for reporting potential exceptions, monitoring and

auditing, and maintaining an organizational structure that supports the furtherance of the program. Each of these elements is detailed below. Providing direction, guidance and oversight is the Ethics Committee of the Board of Directors. The Ethics Officer, and the Ethics Department, are responsible for the day-to-day direction and implementation of the Ethics and Compliance Program. This includes developing resources (including policies and procedures, training programs, and communication tools) for and providing support (including operating the Ethics Help Line, conducting program assessment, and providing advice) to others.

Another important resource that may be able to address issues arising out of this Code of Conduct is the Human Resources Division. Human Resources Division personnel are highly knowledgeable about many of the compliance risk areas described in this Code of Conduct that pertain to employment and the workplace and are responsible for ensuring compliance with various employment laws. If a concern relates to specific details of an individual's work situation, rather than larger issues of organizational ethics and legal compliance, the Human Resources Division is the most appropriate area to contact. In that we promote the concept of management autonomy at local facilities, every effort should be made to resolve workplace conduct and employment practice issues through the individual's supervisor and the Human Resources Division. Experience has shown that this can be an effective and productive way to deal promptly with these matters. All of these individuals or groups are prepared to support USOC colleagues in meeting the standards set forth in this Code.

Setting Standards

With respect to our Ethics and Compliance Program, we set standards through this Code

of Conduct, ethics and compliance policies and procedures and, occasionally, through other guidance mechanisms, such as Compliance Alerts and advisory memoranda. It is the responsibility of each individual to be aware of those policies and procedures that pertain to their activities and to follow those policies and procedures.

Training and Communication

Comprehensive training and education has been developed to ensure that colleagues throughout the organization are aware of the standards that apply to them. Code of Conduct training is conducted when an individual joins the organization and annually for all colleagues. Additional compliance training in areas of compliance risk is required of certain individuals. USOC policies outline the training requirements. All ethics and compliance training is required to be recorded in the USOC's records. Many resources regarding our program are available to all USOC colleagues on our Intranet and to the general public on the Internet. We encourage all colleagues to frequently visit both sites.

Resources for Guidance and Reporting Concerns

To obtain guidance on an ethics or compliance issue or to report a concern, individuals may choose from several options. We encourage the resolution of issues, including human resources-related issues (e.g., payroll, equitable treatment, and disciplinary issues), at a local level. Colleagues should use the human resources-related problem solving procedure at their facility to resolve such issues. It is an expected good practice, when one is comfortable with it and thinks it appropriate under the circumstances, to raise concerns first with one's supervisor. If this is uncomfortable or inappropriate, the individual may discuss the situation with the Human

Resources Division, or another member of management at the facility or in the organization. Individuals are always free to contact the USOC Employee Call Line at 1-719-866-2255 or the USOC Ethics Help Line at 1-877-404-9935. The USOC makes every effort to maintain, within the limits of the law, the confidentiality of the identity of any individual who reports concerns or possible misconduct.

There is no retribution or discipline for anyone who reports a concern in good faith. Any colleague who deliberately makes a false accusation with the purpose of harming or retaliating against another colleague is subject to discipline up to and including termination.

Personal Obligation to Report

We are committed to ethical and legal conduct that is compliant with all relevant laws and regulations and to correcting wrongdoing wherever it may occur in the organization. Each colleague has an individual responsibility for reporting any activity by any colleague, subcontractor, or vendor that appears to violate applicable laws, rules, regulations, policies, or this Code.

Retaliation Prohibited

Colleagues at all levels are prohibited from taking retribution against anyone for reporting or supplying information about a concern. Any USOC colleague who retaliates against another colleague for reporting problems will themselves be subject to discipline up to and including termination. This policy applies even if an allegation was made in good faith but appears ultimately to be groundless.

Internal Investigations of Reports

We are committed to investigating all reported concerns promptly and confidentially to the

extent possible. The Ethics Officer, the Human Resources Division, or the Legal Affairs Division will coordinate, as appropriate, any findings from investigations and will recommend immediately corrective action or changes that need to be made. We expect all colleagues to cooperate with all such investigation efforts.

Corrective Action

Where an internal investigation substantiates a reported violation, it is the policy of the organization to initiate corrective action, including, as appropriate, making prompt restitution of any overpayment amounts, notifying the appropriate governmental agency, instituting whatever disciplinary action is necessary, and implementing systemic changes to prevent a similar violation from recurring in the future.

Discipline

All violators of the Code, or any portion of it, will be subject to disciplinary action. The precise discipline utilized will depend on the nature, severity, and frequency of the violation and may result in any or all of the following disciplinary actions:

- *Oral warning;*
- *Written warning;*
- *Written reprimand;*
- *Suspension;*
- *Termination;*
- *Referral for civil or criminal prosecution; and/or*
- *Restitution.*

Discipline could also take other forms depending on the circumstances.

Measuring Program Effectiveness

We are committed to assessing the effectiveness of our Ethics and Compliance Program through various efforts. Much of this

effort is provided by the Internal Audit Division, which routinely conducts internal audits of issues that have regulatory or compliance implications. Responsible Executives routinely undertake monitoring efforts in support of policies and compliance in general. Through these reviews and monitoring efforts, we are continuously assessing the effectiveness of the Program and finding ways to improve it.

Acknowledgment Process

The USOC requires all colleagues to sign an acknowledgment confirming they have received the Code, understand it represents mandatory policies of the USOC, and agree to abide by it. New colleagues are required to sign this acknowledgment as a condition of employment. Each USOC colleague is also required to participate in annual Code of Conduct training, and records of such training must be retained by each facility. Adherence to and support of the USOC's Code of Conduct and participation in related activities and training is considered in decisions regarding hiring, promotion, and compensation for all candidates and colleagues. New colleagues must receive Code of Conduct training within 30 days of employment.

Acknowledgment Card

I understand that it is a condition of employment with the USOC that I sign this acknowledgement card related to the USOC Code of Conduct. I certify that I have received the USOC Code of Conduct, I understand that it represents mandatory policies of the organization with which I am expected to comply, and I agree to abide by it.

Signature
Printed Name
(as listed in personnel records)
Department
Location
Date

Resources

To get help with an ethics or compliance concern or to report a potential violation of our Code of Conduct, contact your supervisor, another member of local management, the Human Resources Division, the Ethics Officer, or the USOC Ethics Help Line at 1-877-404-9935.

Please tear off, fold and keep this wallet card with you at all times.

USOC ETHICS HELP-LINE

24 Hour Confidential Telephone Assistance (1.877.404.9935)

If you are uncomfortable talking with someone about a particular problem or concern and don't wish to call the Ethics Office, you are encouraged to call the USOC Help-Line.

The USOC Help-Line is a toll-free telephone line dedicated solely to answering colleague questions and concerns and solving problems. All calls to the Help-Line are centrally answered by an independent third-party service. This service is multilingual and available 24 hours a day, seven days a week.

When you call the USOC Help-Line, you may identify yourself *or you may remain anonymous*. If you choose to make your report and remain anonymous, you will be

given a case number to use if you want to call back later to get a progress report. To further protect your anonymity, Help-Line staff do not identify the gender of the caller, tape record the call or use "caller ID" or other methods to identify the number someone is calling from.

Once the Help-Line's call report is complete, it is forwarded to the USOC's Ethics Office for resolution with management and/or the Ethics Committee and Audit Committee as appropriate. When requesting feedback on a report, the Help-Line or the Ethics Office will try to give you as much information about your concern without providing confidential personnel information about other colleagues.

The USOC recognizes that colleagues have concerns about confidentiality and we respect the desire for anonymity in certain situations. Anonymous calls can, however, sometimes make it extremely difficult to solve problems, initiate investigations, and answer questions. If your identity is necessary to address your question or concern, you will be advised in advance, if possible. The Help-Line is an important resource. Please use it.

USOC EMPLOYMENT RELATED CONCERNSCALL LINE

24 Hour Confidential Telephone Assistance (1.719.866.2255)

If you are uncomfortable talking with someone at your location about a particular problem or concern and don't wish to call the Ethics Office or the Ethics Hotline, you are encouraged to call the USOC Employee Call Line at 1-719-866-2255

EMPLOYEE RESOURCES

Ethics Officer/Ethics Department:

Rana Dershowitz
Ethics Officer
1.719.866.4117
E-mail: rana.dershowitz@usoc.org

USOC Ethics Help-Line:

(24 Hour Confidential Telephone Assistance)
Call Toll-Free: 1.877.404.9935

USOC Employee Call Line:

(24 Hour Confidential Telephone Assistance)
Call Toll-Free: 1.719.866.2255

Human Resources:

John McWilliams
Chief Human Resources Officer
1.719.866.2082
E-mail: john.mcwilliams@usoc.org

Legal Affairs:

Rana Dershowitz
General Counsel
1.719.866.4117
E-mail: rana.dershowitz@usoc.org

Government Relations Office:

Desiree Filippone
Director of Government Relations
1.202.466.3399
E-mail: desiree.filippone@usoc.org

Medical, Environment, and Health and Safety:

Mike English
Chief of Sport Performance
1.719.866.4501
E-mail: mike.english@usoc.org

Jay T. Kearney
Team Leader
1.719.866.4978
E-mail: jay.kearney@usoc.org

Margaret Hunt
Head Athlete Trainer
1.719.866.4612
E-mail: margaret.hunt@usoc.org

In order to ensure that its Code of Conduct reflects “best practices,” the USOC has consulted various other publicly available similar codes. Sections of this code were adapted from the codes of Alliant Energy, Banta Corporation, HCA, Inc., and Olin Corporation, with the permission of those organizations.

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