

U S Olympic & Paralympic Committee Policy



Policy Name: Conflict of Interest Policy

Date of Issuance: 2/7/2020

Policy Owner: Ethics Officer

Applies to: BOD and USOPC Staff

Purpose:

To define the USOPC Conflict of Interest Policy.

Policy Statement:

The United States Olympic & Paralympic Committee is committed to sustaining an ethical work place free of conflicts of interest and perceived conflicts of interest.

The USOPC requires that its Board members, employees and volunteers recognize and avoid activities or investments which involve, might appear to involve, or could result in a potential conflict of interest. In order to ensure that all conflicts of interest, potential conflicts of interest and perceived conflicts of interests are properly addressed, all Board members, employees and volunteers are required annually to complete a Disclosure Certification. New employees are also required to complete a Disclosure Certification when they join the USOPC.

The purpose of the Disclosure Certification and annual disclosure process is to enable the self-identification of conflicts and potential conflicts. A conflict of interest exists when an individual's activities or interests interfere with, influence, or have the potential to interfere with or influence his or her responsibilities on behalf of the USOPC or undermine the interests of the USOPC.

Examples of potential conflicts of interest are listed below. If you are unsure whether a specific activity creates a conflict of interest or perceived conflict of interest, it is better to disclose it. For purposes of the USOPC's disclosure process, "family member" includes spouse, child, stepchild, parent, sibling, domestic partner, parent of spouse/domestic partner and sibling and child of domestic partner. Potential conflicts of interest that should be disclosed, include, but are not limited to:

- You own a business, maintain a second job or provide goods or services under a provider, contractor or consulting agreement and the business outside the USOPC that you are involved with provides goods or services to the USOPC or any NGB.
- You or a family member acts as an agent, representative, or consultant to a business whose interests may conflict with the interests of the USOPC.
- You participate in activities, or maintain interests that interfere with the satisfactory performance of USOPC work assignments on behalf of the USOPC (this could include outside employment, membership on Boards or any other non-work activity that interferes with your ability to devote your full time to your USOPC responsibilities).
- You or your family members are involved in outside Olympic related organizations or committees (whether as an employee, Board member or volunteer) such as Bid Committees, NGBs, the IOC, NOCs, and PASO.

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- You or your family member holds a position of executive, officer or director of an NGB or other sport organization that interacts with the USOPC.
- You or your family members have a business relationship with a sponsor, supplier, licensee or vendor of the USOPC (for a current list of USOPC sponsors, suppliers and licensees, go to <https://www.teamusa.org/sponsors>).
- You or your family members have substantial personal or family financial interests in a potential or actual supplier or sponsor. (1% of issued and outstanding securities of corporations whose securities are traded publicly.) Ownership of mutual funds is excluded from disclosure.
- You solicit gifts or gratuities using your USOPC role.
- You accept discounts, gifts or gratuities valued at more than \$100.00 from an entity doing business with the USOPC or an entity seeking business with the USOPC.
- You award USOPC business to, or provide favorable treatment to, a business owned or controlled by a volunteer, family member or personal friend.
- You or your family member are a member of an NGB taking part in USOPC or NGB run programs (such as camps, national championships etc.).

The disclosure of a conflict or potential conflict will not necessarily prohibit involvement in the disclosed activity or with the USOPC. Rather, each disclosure will be reviewed individually by the Ethics Committee and the Ethics Officer. Actions may be recommended to protect the individual and the USOPC from conflicts. These actions may include limitation of involvement, separation from certain USOPC activities or requests to cease the activity in question. All follow-up will be discussed with the individual Board member, employee or volunteer directly. If necessary, managers will also be included in the discussion.