

US Olympic & Paralympic Committee Policy



Policy Name: Code of Conduct Policy

Date of Issuance: 3/10/2021

Policy Owner: Chief Ethics and Compliance Officer

Applies to: USOPC Board of Directors and committees, USOPC staff, volunteers, NGBs

Purpose:

To define the tenets by which the people who work for or on behalf of the USOPC and NGBs conduct themselves consistently with the USOPC's mission and core values.

Policy Statement:

I. Introduction

The USOPC supports United States Olympic and Paralympic athletes in achieving sustained competitive excellence and preserving the Olympic ideals, thereby inspiring Americans. The USOPC accomplishes this mission through its commitment to:

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

The USOPC has adopted this Code of Conduct to support these values.

II. Applicability

This Code of Conduct applies to all employees, volunteers, board members, committee and task force members and member organizations of the USOPC.

As to NGBs, all provisions of this policy are mandatory in substance and must be followed as applicable by each NGB. This policy sets forth minimum standards and outlines basic requirements for NGBs to incorporate into their respective Codes of Conduct. NGBs may adopt Code of Conduct standards that are more demanding than this policy.

III. Reporting Obligations

No code of conduct can address every situation, nor can it take the place of good judgment and integrity. The USOPC maintains an "open door" for anyone who has questions or concerns. The USOPC will support all efforts to comply with this Code of Conduct. If you need advice or assistance concerning the application of any aspect of these standards, consult your supervisor or manager, or the Ethics and Compliance team. You are expected to seek advice and clarification promptly when you are uncertain about proper actions or practices.

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You should be alert and sensitive to situations that could result in unethical, illegal or improper actions. You have an obligation to report potential or actual violations of this Code of Conduct to your supervisor, the USOPC Integrity Line, the Ethics and Compliance team, or any other designated reporting authority identified by USOPC.

For more on how to report and the USOPC's zero tolerance approach to retaliation, please see the USOPC Speak Up Policy.

IV. Legal Compliance

The USOPC requires that you follow the Code of Conduct and abide by all applicable USOPC policies and procedures; United States federal, state and local law as applicable, including the Ted Stevens Olympic and Amateur Sports Act; and foreign law as applicable. If you ever encounter a conflict of law, such as a conflict between United States and foreign law, or have any questions about the legality of any action, contact the Ethics and Compliance team for further information and guidance.

V. Commitment to Integrity

The USOPC is committed to honesty and integrity as the cornerstone of our activities. In turn, the USOPC expects you to conduct yourself in an ethical and legal manner as a representative of, the USOPC. This requires that you:

- Respect the rights of all individuals to fair treatment and equal opportunity, free from discrimination or harassment of any type, including, without limitation discrimination on the basis of race, color, religion, sex, sexual orientation, disability, gender identity, age, national origin, pregnancy, childbirth or related medical conditions, genetic information, veteran status, or any other characteristic protected under applicable federal, state, or local law.¹
- Know, understand and comply with all applicable laws, regulations and codes of conduct.
- Ensure that all USOPC work and transactions are handled with honesty and recorded accurately.
- Protect information that belongs to the USOPC, our staff, volunteers, member organizations and customers.
- Never use USOPC assets or information for personal gain.
- Recognize that even the appearance of misconduct or impropriety can be very damaging to the reputation of the USOPC and act accordingly.

The USOPC recognizes that wagering on Olympic, Paralympic, and other USOPC-sanctioned events and on athletes where they are participating in those events, for example sports book bets and fantasy sports programs that have the possibility of valuable winnings ("Olympic Wagering"), is legal and regulated in a number of US States and foreign jurisdictions. At the same time, it is critical to the avoidance of actual and/or apparent conflicts of interest and to the overall integrity of the Olympic and Paralympic community that no person involved in the community promote, support, or otherwise engage in Olympic Wagering. Thus you must at all times refrain from directly or indirectly:

1. Engaging in Olympic Wagering;

¹ It is acknowledged that, as to gender and gender identity, this prohibition on discrimination does not extend to decisions on eligibility and classification for the purposes of sport competition; such decisions may well, for example, be based on gender for any particular event.

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2. Promoting Olympic Wagering;
3. Facilitating or otherwise supporting Olympic Wagering;
4. Knowingly sharing confidential athlete, team, or competition information with a person or entity involved in Olympic Wagering; or
5. Attempting to influence the course or result of any competition in connection with Olympic Wagering

If anyone approaches you about engaging in items 2-5 above, you have an obligation to disclose this, as set out in Section II above.

Additionally, the USOPC finds sexual and physical abuse intolerable and in direct conflict with Olympic and Paralympic ideals. The USOPC is committed to ensuring that it and its employees, volunteers, board members, committee and task force members, and member organizations promote an environment free from such abuse; and such commitment extends not only to the USOPC's workplace, but also to the creation of safe sporting environments for athletes. To that end, the USOPC forbids any form of sexual or physical abuse, whether in the workplace or outside it, and including instances involving athletes.

Your obligations to report any alleged sexual or physical abuse, and information on how to report, are contained in the [USOPC Athlete Safety Policy](#).

VI. Ethics and Compliance Program

The USOPC has an independent Ethics and Compliance Committee and a Chief Ethics and Compliance Officer who supports that committee. The Chief Ethics and Compliance Officer and their team monitor ethics reports and conduct ethics education at the USOPC. The Chief Ethics and Compliance Officer works closely with the Chair of the Ethics and Compliance Committee to ensure that the committee is involved in ethics issues as appropriate.

VII. Conflicts of Interest

The USOPC has a [Conflict of Interest Policy](#) that requires that any conflicts of interest, whether actual or apparent, be reported promptly to the Ethics and Compliance team. In addition, all USOPC staff, volunteers, and Board and committee members, are required to complete an annual conflict of interest disclosure and certification.

VIII. Independence of the Office of the Athlete Ombuds

No USOPC board, committee or task force member, or any NGB or USOPC employee shall prevent, prohibit, or interfere with the Office of the Athlete Ombuds carrying out any duties or responsibilities as defined under Section 220509 of the Ted Stevens Olympic and Amateur Sports Act. In addition, no USOPC employee, contractor, agent, volunteer, or NGB shall take or threaten action against an athlete as a reprisal for disclosing information to or seeking assistance from the Office of the Athlete Ombuds.

IX. Business with or in Foreign Countries

Business conduct in foreign countries may sometimes differ from the United States, both in terms of common practice and legality. The USOPC requires that all business matters be conducted in an ethical and legal manner.

Gifts: The giving of gifts to, and receiving of gifts from, foreign nationals or representatives of foreign governments is governed by a complex set of US and foreign laws. Generally, the giving and receiving of such gifts is very limited or prohibited. Before offering a gift to a foreign national, you must receive the approval of the

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Ethics and Compliance Officer. In addition, the giving and receiving of such gift(s) is subject to the [USOPC Gifts and Entertainment Policy](#).

Payments: It is a felony under United States laws for the USOPC, any of its staff, or anyone acting on its behalf to give, offer, promise or authorize a payment to a foreign official, foreign political party or official thereof, or any candidate for foreign political office, for the purpose of corruptly obtaining or retaining business for the USOPC.

United States law also makes it a felony to pay money or anything of value to a commission agent, sales representative or consultant when there is knowledge or firm belief that the payment will be used to corruptly influence a government official in connection with business the USOPC is attempting to obtain or retain. Political contributions will not be made by or on behalf of the USOPC in foreign countries.

The USOPC will observe the laws of foreign countries in which it operates concerning payments of agents' fees and commissions, provided these laws are not in conflict with United States law. You are not to engage in activities designated to circumvent foreign laws concerning retaining or paying sales representatives and consultants.

Export Control Laws: It is the USOPC's policy to comply with the export and reexport control rules and regulations under the Export Administration Regulations (EAR) administered by the United States Department of Commerce and the International Trade in Arms Regulations (ITAR) administered by the United States Department of State. You are not to engage in any export-related transaction on behalf of the USOPC which would violate these regulations.

X. Business Relationships

It is imperative that all USOPC, supplier, vendor and other business relationships are managed in a fair, equitable, ethical and legal manner consistent with the Code of Conduct, all applicable law and good business practices. Wherever practical, the USOPC provides a competitive opportunity for suppliers and vendors' business, and we enlist their active support in ensuring that we meet customer expectations regarding quality, cost and delivery. Decisions to hire or engage a vendor or supplier should be made on the basis of objective criteria, and not on the basis of personal relationships, friendships or the opportunity for personal gain, financial or otherwise. Prior to entering into a transaction or contract for a purchase or potential purchase that involves an actual or perceived conflict of interest, you should consult with the Ethics and Compliance team.

XI. Personal Use of Organization Resources

It is your responsibility to protect and preserve USOPC resources. USOPC resources include such things as company time, materials, supplies (including food), equipment (including vehicles), information, computer and data systems, facilities, and other property. These resources are provided to you to fulfill the USOPC's mission and work and are to be maintained and used for authorized USOPC-related purposes only. The use of USOPC resources for personal financial gain is strictly prohibited except where expressly authorized. You should consult the [Employee Handbook](#) for further details. If you have a question about use of any USOPC resources, you should contact your supervisor. You should report any improper use of USOPC resources to your supervisor or manager, People & Culture, the Ethics and Compliance team or the USOPC Integrity Line.

The USOPC also has a [Gifts and Entertainment Policy](#) that applies to giving and receiving any type of entertainment or gifts in connection with your work with USOPC or its member organizations. The Gift Policy also covers gifts to US state, and local government employees. You should consult the Gift Policy, and if necessary obtain permission pursuant to the policy, before giving or receiving any entertainment or gifts.

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XII. Political Activities and Contributions

The USOPC and its representatives comply with all federal, state and local laws governing participation in government relations and political activities. Additionally, USOPC 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. The USOPC also does not permit any political literature, campaign materials or politically orientated information, materials, posters, signs, or buttons to be displayed, circulated or otherwise present on USOPC property or in the course of conducting work for the USOPC.

There are some very limited exceptions to this policy. At times, the USOPC may ask individuals to make personal contact with government officials or to write letters to present the USOPC's position on specific issues. Before doing so, you should confirm with the Ethics and Compliance team and Government Relations team that such contact is authorized and in compliance with this policy, and that you are knowledgeable on the specific issues about which you have been asked to speak.

You may, of course, participate in the political process on your own time and at your own expense, so long as you do not give the impression that you are speaking on behalf of or representing the USOPC in such activities. Nor can you be reimbursed by the USOPC for any personal contributions for such purposes. If you are seeking public office, you may use vacation time or request leaves of absence to campaign or hold office. The USOPC will not make contributions to any political candidate or party.

XIII. USOPC Information

You are responsible for the integrity and accuracy of organization documents, communications and financial records. All financial information must reflect actual transactions and conform to generally accepted accounting principles. It is a violation of the Code of Conduct to alter or falsify information, including any record or document, to intentionally make a false or exaggerated statement or claim to anyone, or to mislead anyone. Anyone having concerns regarding questionable accounting or auditing matters should report their concerns to the Ethics and Compliance team or the Speak Up Line.

USOPC information assets are valuable to the organization, and all USOPC representatives must diligently protect this information from loss, theft, inadvertent or unauthorized disclosure or misuse. It is essential that everyone do their part to protect USOPC information, whether stored in computers, files, or elsewhere. You must not discuss with or disclose to any unauthorized persons inside or outside the USOPC any information that is confidential or not publicly available.

USOPC business should not be discussed with unauthorized persons. You should be careful about discussing USOPC information and activities in the presence of, or within hearing distance of, unauthorized personnel. You should also not seek or accept any information to which you and the USOPC are not legitimately entitled, regardless of the source.

Your obligations to maintain the confidentiality and protection of USOPC information does not end even if your employment or other relationship with the USOPC ends.

XIV. Intellectual Property

The USOPC protects the ownership of its intellectual property as set forth in the Employee Handbook. In addition, you should contact USOPC's Legal team regarding any anticipated use of intellectual property that does or may belong to someone else.

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XV. Resources

Any individual with questions about this policy is encouraged to contact the Chief Ethics and Compliance Officer, the Ethics Director, or send an email to ethics@usopc.org.

Chief Ethics and Compliance Officer: Holly Shick (holly.shick@usopc.org)

Director of Ethics: Evangeline Rivera (evangeline.rivera@usopc.org)

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Revision History (as of March 10, 2021)

- March 10, 2021 (revised to include reference to independence of Ombuds Office).