

(UPDATED DRAFT 080411)

**United States Field Hockey Association, Inc
Code of Ethics**

1. General

1.1: Article 21. Article 21 of the By-Laws of the United States Field Hockey Association, Inc ("USFHA") requires USFHA as the National Governing Body (NGB) for the sport of field hockey in the United States to adopt a Code of Ethics and an Ethics and Conflicts-of-Interest Policy (collectively, the "Code") applicable to all USFHA employees, Board Directors, officers, committee members and volunteers. Article 21 also requires the Code to be approved by the United States Olympic Committee (USOC), and that each USFHA employee and volunteer annually certify compliance with the Code. This document fulfills the requirements of Article 21 as the Code of Ethics for USFHA.

1.2: Purpose and Scope. This Code of Ethics contains general guidelines for conducting the business of USFHA, consistent with the highest standards of ethical behavior. It aims to promote honest and ethical conduct and compliance with applicable laws, rules, regulations and standards within the organization. USFHA recognizes that no code of ethics or conduct can replace the thoughtful behavior of ethical individuals and organizations. However, such a code can focus attention on areas of ethical risk, provide guidance to help recognize and deal with ethical issues, and help to foster a culture of honesty and accountability within USFHA. To the extent this Code requires a higher standard than is required by commercial practice or applicable laws, rules or regulations, USFHA aims to adhere to these higher standards.

1.3: Applicability. The Code applies to all USFHA Board Directors; officers; employees; volunteers; members of USFHA committees and task forces; athletes, coaches, umpires, trainers, team managers, other officials and the like; agents and representatives acting on behalf of USFHA; and to independent contractors, companies and consultants working for USFHA. For the purposes of this Code, the above individuals and organizations are referred to in the Code as "USFHA Representative" or "USFHA Representatives".

1.3: Other Applicable USFHA By-Laws. The following USFHA By-Laws are also applicable to ethical principles and standards, good ethical practices and the avoidance of conflicts-of-interest, and are incorporated into this Code:

- By-Law 5.4 - Qualifications. A Board Director shall "have the highest personal values, judgment and professional integrity"; and "have demonstrated exceptional ability and judgment."
- By-Law 5.12 – Conflict of Interest. This By-Law prohibits a Board Director, an officer, a member of any committee, employee, paid consultant to, or agent / representative of, the USFHA from participating in the "negotiation, evaluation or approval of any contractual arrangement" with USFHA if he/she or their immediate family would financially benefit from the arrangement. If such an individual finds out that such an arrangement is proposed, then he/she is required to promptly notify in writing the Board Chair, who in turn discloses it to the Board and refers it to the Ethics Committee for

determination whether there is a conflict-of-interest. The By-Law also states that in the event of there being a potential conflict-of-interest, such an individual is required to excuse himself / herself from discussions and voting. A violation of this requirement entitles the Board to recover any financial benefit obtained, void the contractual arrangement, and to initiate disciplinary procedures against the individual concerned.

- By-Law 23.3 – Standard of Conduct for Directors and Officers, particularly 23.3.1 - General. This By-Law requires Board Directors and Officers to perform their duties in good faith, in a manner they reasonably believe to be in the best interests of USFHA, and with a care “an ordinarily prudent person in a like position would exercise under similar circumstances.”

1.4: Code of Ethics Review and Update. The USFHA Ethics Committee shall review and update the Code of Ethics annually and following any amendment of the USFHA By-Laws by the USFHA Board. If amended, the revised Code shall be submitted for approval to the USFHA Board and the USOC.

2. Definition of ‘Ethical Behavior’ and ‘Conflicts-of-Interest’

2.1: Ethical Behavior. Ethical behavior is a commitment to do what is right; to obey all laws, rules and regulations; to behave with integrity and honesty; to avoid conflicts-of-interest and perceived conflicts-of-interest; to treat people fairly, to respect diversity; **to always behave appropriately when interacting with minors in a supervisory role and not to molest or sexually abuse in any way those in one’s charge**; to accept accountability; to communicate openly, and to always behave in a way that is above reproach.

2.2: Conflicts -of-Interest. A conflict-of-interest is a situation in which an individual (including a corporate entity) who, contrary to the obligation and absolute duty to act for the benefit of an organization, exploits a relationship for personal benefit. ‘Personal benefit’ is here defined as a personal, family or business financial gain; a future consideration; a ‘quid pro quo’; or a ‘hold’ or undue influence over an individual (or corporate entity).

3. Code of Ethics Requirements

3.1: General Expectations of USFHA Representatives. USFHA Representatives are expected at all times to meet the high ethical standard of behavior defined in 2.1 above; to avoid conflicts-of-interest and perceived conflicts-of-interest as defined in 2.2 above; and to observe all laws, rules and regulations applicable to USFHA’s business. No USFHA Representative has the authority to require or approve any action that would break the law or violate ethical standards. They shall avoid situations where they engage in activities that would accomplish indirectly for USFHA what USFHA could not directly do legally or ethically. No USFHA Representative shall feel that a compromising or unethical situation is justified by any possible business result.

3.2: Disclosure of Conflicts of Interest - General

Notwithstanding the requirements of 3.3 below regarding annual disclosure certification, USFHA requires that USFHA Representatives disclose any situations that reasonably would be expected to give rise to a conflict of interest, or to a perception of a conflict-of-interest. If a USFHA Representative suspects that he or she has a conflict of interest, or something that others could reasonably perceive as a conflict of interest, the USFHA Representative must report it to the USFHA Ethics Committee. The USFHA Ethics Committee will work with the USFHA Representative to determine whether they have a conflict of interest and, if so, how best to address it.

3.3: Annual Disclosure Certification

Notwithstanding the general requirements of 3.2 above, the following USFHA Representatives are required to annually certify that they have disclosed activities, situations and investments that involve, might appear to involve, or could result in a potential conflict-of-interest as defined in this Code. They must similarly disclose any circumstance or relationship that has the potential to influence, or be perceived to influence, the objectivity of their decision-making when representing or doing business for or on behalf of USFHA.

- USFHA Board Directors.
- USFHA Officers.
- USFHA Senior Managers, including the Executive Director; Director of Finance; Finance Manager; Managing Director Olympic & Athlete Development, Strategic Partnerships; Director of Events; Director of Marketing and Brand Management; Technical Director of High Performance; Women's National Team Coach; and Men's National Team Coach. The Executive Director may require other USFHA employees or staff to comply with this annual disclosure certification requirement at his / her discretion in consultation with the Ethics Committee.
- All members of the following USFHA Committees: Judicial, Ethics, Nominating, and the Athletes Advisory Committee.

Circumstances which could involve potential conflicts-of-interest include, but are not limited to, the following.

- Outside business activities, interests (financial or otherwise), associations or relationships (including those by or with family members) which involve acting as an owner, vendor, manager, employee, agent, representative, consultant or the like in a field hockey-related business (e.g. college recruiting consulting, sports camps, coaching, team management, equipment and clothing supply) (whether or not they may be in conflict with the interests of USFHA).
- Outside business activities, interests (financial or otherwise), associations or relationships (including those by or with family members) as above which involve the USOC, IOC, FIH, PAHF, or other NGB that may conflict with the interests of USFHA.
- Outside business activities, interests (financial or otherwise), associations or relationships (including those by or with family members) as above which involve sponsors of, and vendors / suppliers to, USFHA or USFHA-sanctioned events.
- Past, present or pending financial contributions, loans or donations made by the individual; or by an organization that the individual has a substantial personal, family or

financial interest in, or where that individual is an officer, director or senior manager; to the USFHA, IOC, FIH, PAHF, or other NGB.

- Outside business activities, interests (financial or otherwise), associations or relationships (including those by family members), however minor, with a USFHA Board Director, USFHA Senior Manager or USFHA Committee member (including businesses controlled by them) as defined in this clause.
- Membership of private and public foundations, and other non-profit organizations, associated with USFHA and /or field hockey in the United States.
- Placement of USFHA business in a firm owned or controlled by a USFHA Representative, volunteer, family member, or personal friend.

Disclosure of the above and the like is mandatory as part of the annual certification process. Such disclosure is required to ensure that business decisions made on behalf of USFHA are protected from potential outside influence.

In the event of uncertainty about disclosing a particular circumstance, individuals should err on the side of caution. Conflicts-of-interest that do not exist may be perceived by others to exist.

Individuals who do not disclose, or provide false, deliberately-incomplete, or misleading information, may be subject to sanctions by USFHA that include employment termination or exclusion; termination of USFHA membership, and exclusion from volunteer service.

Certification of compliance shall be made on the Annual Disclosure Certification Form as appended to the Code, or as is subsequently amended by the USFHA Ethics Committee and approved by the USFHA Board.

Each year, the Executive Director shall ensure that all required Annual Disclosure Certification Forms are reviewed upon completion by the USFHA Ethics Committee.

3.4: USFHA Board of Directors Annual Ethics Training

The Ethics Committee shall conduct annual ethics training for the USFHA Board, preferably at the Board Meeting immediately after any election of new Board Members each year.

3.5: Publication of the Code of Ethics

Once approved by the USFHA Board, the Code of Ethics shall be posted continuously on the USFHA website in a prominent location.

3.6: USFHA Employee Orientation

A copy of the Code of Ethics shall be included as part of the orientation of new USFHA employees.

END

Approved by the USFHA Board: _____

Approved by the USOC: _____

**United States Field Hockey Association, Inc
Code of Ethics
ANNUAL DISCLOSURE CERTIFICATION FORM**

Year: _____

INSTRUCTIONS

If you have received this Form, you are required to certify your compliance each year with the United States Field Hockey Association, Inc.'s ('USFHA') Code of Ethics ('Code'), particularly with respect to disclosure of activities that are, or may be perceived to be, conflicts-of-interest as defined in the Code of Ethics.

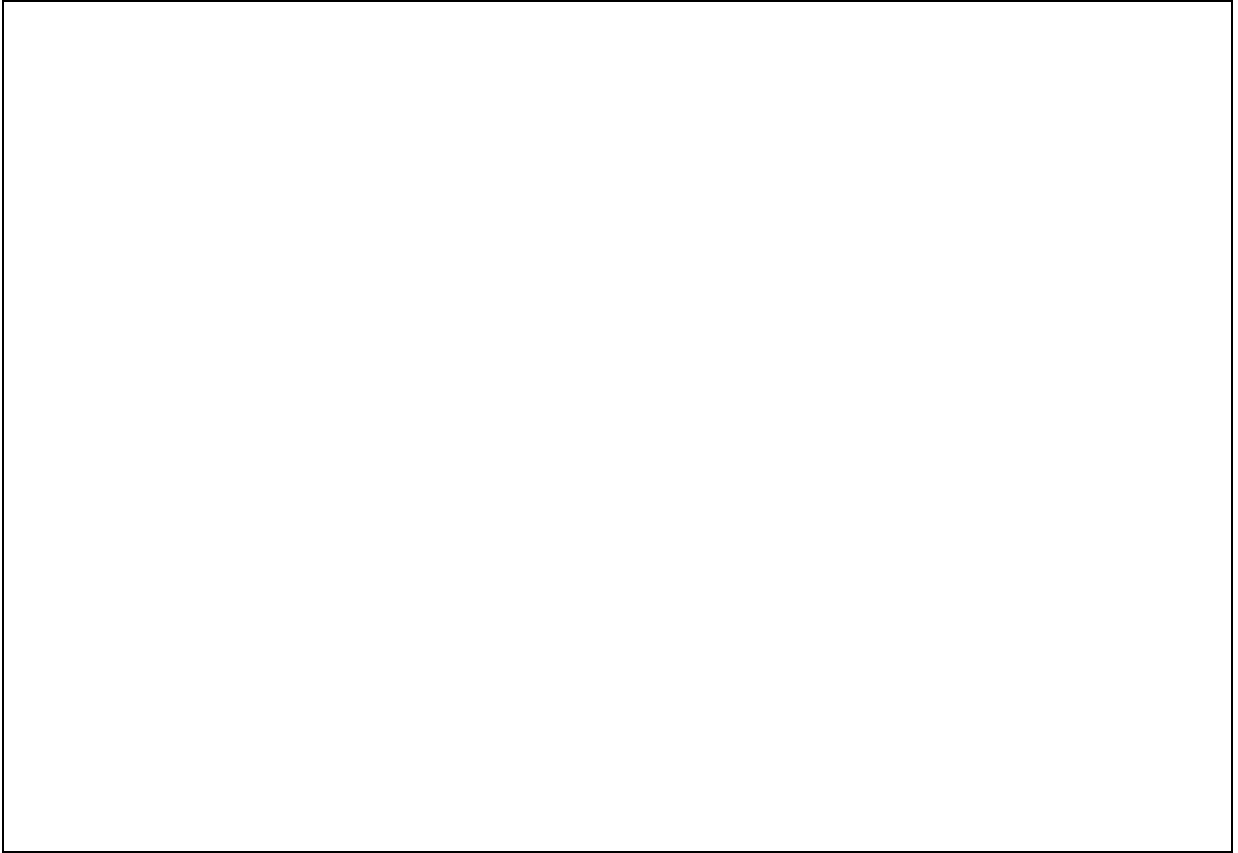
1. Please review the requirements of the USFHA Code of Ethics with regard to conflicts-of-interest and the disclosure of activities, interests and the like.
2. Complete the following by checking as appropriate and providing details:

A _____ I do not have, nor do I presently anticipate having, any potential conflicts-of-interest as described in the Code, nor do any of the circumstances described in Clause 3.3 of the Code, or the like, apply to me.

B _____ I believe that I have, or may be perceived to have, a potential conflict of interest that may arise from a circumstance as described in Clause 3.3 of the Code, or the like, and disclose details below for review:

C _____ I do not believe that I have, or may be perceived to have, a potential conflict-of-interest as described in the Code, but one or more of the circumstances described in Clause 3.3 of the Code, or the like, apply to me and I disclose details below for review:

My disclosures are listed below (use additional piece of paper if necessary)



3. Complete the following, and then return to USFHA:

NAME: _____

PRESENT ROLE OR POSITION: _____

SIGNATURE: _____

DATE: _____