



USBC Bylaws Ethics Policies Supplement

Introduction

Section A. Policy Ownership

The Policies in this supplement have been adopted by the USBC Board of Directors to comply with the Policies of the United States Olympic and Paralympic Committee ("USOPC") and the Ted Stevens Act. These Policies can only be changed by a majority vote of the USBC Board of Directors unless the Board has delegated the authority to the USBC Legal and Ethics Committee.

Section B. Applicable Parties

These policies apply to all USBC employees, national board members, directors, committee members, hearing panels and task force members, Team USA Coaches, and volunteers serving on behalf of USBC Headquarters (collectively "Affiliated Individuals"). Where reasonable, independent contract workers may be required to comply with policies in their contract.

The USBC has adopted these policies with the expectation the people who work, lead or volunteer on behalf of USBC conduct themselves consistent with USBC's mission and core values.

Section C. Policy Leads

Affiliated individuals with questions or to report a violation of any of the foregoing ethics policies shall submit it to the appropriate policy lead. Policy leads are responsible for these policies and their enforcement.

Affiliated Individual	Policy Lead	Contact information
Board, committee, task force and hearing panel members, volunteers and Executive Director	Legal & Ethics Committee	LegalChair@bowl.com
Employees and independent contract workers	Human Resources	HR@bowl.com
Team USA Members and Coaches	Rules and Compliance	Mike.spridco@bowl.com

Section D. Additional Resources

1. Individuals who wish to report concerns related to this policy as it relates to involvement in the Olympic and Paralympic Movement, or are uncomfortable reporting a concern directly to their NGB, may also submit a report using the [USOPC Integrity Portal](#). The Integrity Portal allows individuals to submit concerns to the USOPC confidentially and/or anonymously. Reports may be made online or by telephone.

Website: usopc.ethicspoint.com

Hotline: 877-404-9935

2. Team USA athletes may contact the Athlete Ombuds for independent and confidential advice on a variety of sport related matters, including their rights, applicable rules, policies or processes, and questions related to resolving disputes and grievances. The Athlete Ombuds can also help Team USA athletes connect with legal counsel or mental health resources if needed. All other NGB athletes (i.e., athletes competing domestically at the masters or youth level, recreational athletes, foreign athletes), are welcome to visit the Athlete Ombuds website to review informational resources and should work directly with their NGB to understand additional resources and options available to them.

Email: ombudsman@usathlete.org

Website: www.usathlete.org



Ethics Policy I – Code of Conduct

Section A. Introduction

No code of conduct can address every situation, nor can it take the place of good judgment and integrity. USBC maintains an “open door” for anyone who has questions or concerns. USBC will support all efforts to comply with this Code of Conduct. For advice or assistance concerning the application of any aspect of these standards, consult the appropriate Policy Lead. Seek advice and clarification promptly when uncertain about proper actions or practices.

Section B. Reporting Obligations

Affiliated individuals should be alert and sensitive to situations that could result in unethical, illegal or improper actions and have an obligation to report potential or actual violations of this Code of Conduct to the appropriate Policy Lead.

Affiliated individuals who make a report to USBC’s outside counsel will have all communications treated with discretion and care. Callers may ask to remain anonymous.

Section C. Whistle-Blower

Any affiliated individual who reports, in good faith, a violation or potential violation of any policy is protected under USBC’s Whistle-Blower Policy which is detailed in Article VI of the USBC Bylaws Due Process Supplement. USBC’s Whistle-Blower Policy includes a No Retaliation statement.

Under no circumstances will an individual be subject to any disciplinary or retaliatory action for filing, in good faith, a report of a violation or potential violation of the Code of Conduct. However, filing known false or malicious reports will not be tolerated, and anyone filing such reports will be subject to appropriate disciplinary action.

Section D. Athlete Safety Program

All affiliated individuals are in roles within USBC which requires one to be a Registered Volunteer and must comply with all policies of USBC’s Athlete Safety Program as detailed in the Athlete Safety Handbook.

Section E. Legal Compliance

USBC requires affiliated individuals to follow the Code of Conduct and abide by all applicable USBC rules, policies and procedures; United States federal, state and local law as applicable, including the Ted Stevens Olympic and Amateur Sports Act, codified at 36 U.S.C. §§ 22501 – 22529; and foreign law as applicable. If a conflict of law occurs, such as a conflict between United States and foreign law, or there are questions about the legality of any action, contact USBC’s outside counsel for further information and guidance.

Section F. Commitment to Integrity

USBC is committed to honesty and integrity as the cornerstone of our activities. In turn, USBC expects affiliated individuals to conduct themselves in an ethical and legal manner as a representative of USBC.

This requires one to:

- 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, genetic information, veteran status, or any other characteristic protected under applicable federal, state, or local law.
- Know, understand and comply with all applicable laws, regulations and codes of conduct.
- Ensure that all USBC work and transactions are handled with honesty and recorded accurately.
- Protect information that belongs to USBC, our workers, volunteers, members and customers.
- Never use USBC assets or information for personal gain.
- Recognize even the appearance of misconduct or impropriety can be very damaging to the reputation of USBC and act accordingly.



- Comply with the [Olympic Movement Code on the Prevention of the Manipulation of Competitions](#) and commit to promote sport free from manipulation, corrupt conduct, or using or disclosing inside information for any purpose.

Section G. Wagering

USBC recognizes wagering on bowling, Olympic, Paralympic, and other USBC or USOPC events and on athletes where they are participating, for example Calcuttas, may be legal and regulated in the State of Nevada and in a number of 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 bowling and the Olympic movement that no affiliated individual promote, support, or otherwise engage in wagering on bowling or Olympic Wagering. Thus, one must at all times refrain from directly or indirectly:

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

If approached about engaging in items 2-5 above, affiliated individuals have an obligation to disclose this, as set out in Section B.

Section H. Abuse

USBC finds sexual and physical abuse intolerable and in direct conflict with USBC ideals. USBC is committed to ensuring it and its employees, volunteers, board members, committee and task force members, promote an environment free from such abuse; and such commitment extends not only to the USBC's workplace, but also to the creation of safe sporting environments for athletes.

USBC forbids any form of sexual or physical abuse, whether in the workplace or outside it, including instances involving athletes. Affiliated individuals have a duty to report any alleged sexual or physical abuse occurring in the workplace or at any USBC supported training or sport activity to the US Center for SafeSport or USBC's Human Resources department in accordance with USBC's Athlete Safety Handbook.

Section I. Business Relationships

It is imperative all USBC, supplier, vendor and other business relationships are managed in a fair, equitable, ethical and legal manner consistent with the Code of Conduct, all applicable laws and good business practices.

Wherever practical, the USBC provides a competitive opportunity for suppliers and vendors' business, and enlist their active support in ensuring USBC meets 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, one should consult with USBC outside legal counsel.

Section J. Personal Use of Organization Resources

Affiliated individuals must protect and preserve USBC's resources. USBC resources include such things as company time, materials, supplies (including food), equipment (including vehicles), information, electronic mail and computer systems, facilities and other property. These resources are provided to fulfill USBC's mission and work and are to be maintained and used for authorized USBC-related purposes. The use of USBC resources for personal financial gain is strictly prohibited except where expressly authorized. Report any improper use of USBC resources to USBC's outside counsel.

Section K. Political Activities and Contributions

USBC and its representatives comply with all federal, state and local laws governing participation in



government relations and political activities. Additionally, USBC funds or resources should not and will not be contributed to individual political campaigns, political parties, or other organizations that intend to use the funds primarily for political purposes. The USBC 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 USBC property or in the course of conducting work for USBC.

There are some very limited exceptions to this policy. At times, the USBC may ask individuals to make personal contact with government officials or to write letters to present USBC's position on specific issues.

Affiliated individuals may participate in the political process on their own time and at their own expense, so long as one does not give the impression they are speaking on behalf of or representing USBC in such activities. Nor can one be reimbursed by USBC for any personal contributions for such purposes. If an affiliated individual is seeking public office, USBC will not make contributions to any political candidate or party.

This policy is required by USBC Bylaws, the Ted Stevens Olympic and Amateur Sports Act, the Internal Revenue Code and other applicable laws. Contact USBC's outside legal counsel with any questions or concerns regarding these requirements.

Section L. USBC Information

Affiliated individuals are each responsible for the integrity and accuracy of USBC's documents, communications, member information, 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 President or to USBC's outside legal counsel, who will refer the matter to the Board of Directors' Audit Committee.

USBC's information assets are valuable to the organization, and it is USBC's policy all USBC 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 USBC information, whether stored in computers, files or elsewhere. Affiliated individuals must not discuss with or disclose to any unauthorized persons inside or outside USBC any information that is confidential or not publicly available.

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

Obligations to maintain the confidentiality and protection of USBC information does not end when the relationship with USBC ends.

Section M. Intellectual Property

USBC protects the ownership of its intellectual property. Contact USBC's outside counsel regarding any anticipated use of intellectual property that does or may belong to someone else.

Section N. Reporting

Any individual who believes an affiliated individual has committed a code of conduct violation may submit a report to the appropriate policy lead. Upon receipt of a potential code of conduct violation, the policy lead, or a disinterested individual if the policy lead has a conflict of interest, will investigate the claim and make a determination on potential violations. An individual will have the opportunity for a hearing executed by a disinterested party for any determination which limits an individual's right to participate. The procedures in the USBC Bylaws Disciplinary Supplement will be followed.



Ethics Policy II – Team USA Code of Conduct

Section A. Legal Compliance

USBC requires members of Team USA to follow this Code of Conduct and abide by all applicable USBC and USOPC policies and procedures; United States federal, state and local law as applicable, including the Ted Stevens Olympic and Amateur Sports Act, codified at 36 U.S.C. §§ 22501 – 22529; 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 Senior Director of Rules and Compliance.

Section B. Athlete Safety Violations – USBC Athlete Safety Code of Conduct and the U. S. Center for SafeSport Code outlines prohibited conduct and applies without regard to age, race or ethnicity, gender identity, sexual orientation, disability or competitive level.

USBC’s Athlete Safety Code of Conduct can be found in USBC Athlete Safety Handbook. USBC’s SafeSport Policy can be found in Article V of the USBC Bylaws Disciplinary Supplement. Links to additional SafeSport resources, including the code, can be found at BOWL.com/RVP.

Section C. Wagering

USBC recognizes wagering on bowling, Olympic, Paralympic, and other USBC or USOPC events and on athletes where they are participating, for example Calcuttas, may be legal and regulated in the State of Nevada and in a number of 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 bowling and the Olympic movement that no affiliated individual promote, support, or otherwise engage in wagering on bowling or Olympic Wagering. Thus, one must at all times refrain from directly or indirectly:

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

Section D. Conduct. As a Member of the Team, I promise and agree to:

1. Act in a sportsmanlike manner consistent with the spirit of fair play and responsible conduct;
2. Maintain a level of fitness and competitive readiness which will permit my performance to be at a maximum level of my abilities;
3. Avoid criminal behavior and acts including the mischievous damaging and vandalizing of personal, private and public facilities or property on and away from the venue;
4. Not commit a doping violation as defined by the World Anti-Doping Agency (WADA), the United States Anti-Doping Agency (USADA), the Pan American Sport Organization (PASO), or the USOPC;
5. Not engage in any conduct that is criminal under any laws applicable to me, including, but not limited to laws governing the possession and use of drugs and alcohol and providing of drugs to any person and of alcohol to minors. Purchasing or providing alcoholic beverages to persons under the age of 21 is prohibited at all times.
6. Not exhibit drunkenness and being under the influence of recreational drugs;
7. Refrain from conduct detracting from my ability or that of my teammates to attain peak performance;
8. Refrain from loaning my identification credentials to any athlete;
9. Not participate or assist in any gambling or betting activities associated with any event related to my sport or my participation;
10. Not use or authorize the use of photographs, films or videos of myself in my USBC Team USA apparel or equipment or the use of the USBC logo for the purpose of trade, without the prior written consent of USBC;
11. Understand that if I require legal representation because I am accused of a doping violation or



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- am accused of criminal misconduct, or if for any other reasons I require the services of an attorney, I will be personally responsible for payment of such legal fees and expenses;
12. Respect the members of my Team, other teams, spectators and officials, and engage in no form of verbal, physical or sexual harassment or abuse;
 13. Use my best efforts to assist other members of my Team, the Team Manager(s), Team Coaches and Team Staff Members in achieving the goals and objectives of the Team;
 14. Follow my individual Team rules, including by way of example: those specified in the Athlete Agreement, Code of Conduct, and U.S. Team Staff Handbook, rules regarding curfew or attendance at Team meetings or functions as may be specified in writing or by the Team Manager, Team Coach, Team Staff Member or their designee;
 15. Adhere to the USBC Registered Volunteer Code of Conduct and Policies
 16. Act in a way that will bring respect and honor to my Team, USA Bowling, the sport and myself and remember that I am an ambassador for my sport and my country.
 17. Comply with the [Olympic Movement Code on the Prevention of the Manipulation of Competitions](#) and commit to promote sport free from manipulation, corrupt conduct, or using or disclosing inside information for any purpose.

Section E. Infractions of Conduct.

The following list illustrates conduct which is inconsistent with Team USA Bowling Conduct stated in item 1 and the responsibilities associated with being affiliated with Team USA. This list does not establish a complete set of rules prescribing every aspect of inappropriate behavior and is intended to illustrate a sampling of unacceptable behaviors and their relative level of severity.

1. Level 1
 - a. Verbally abusive, disrespectful, offensive, racist or sexist behavior.
 - b. Being late for curfew or being late or absent from an official event activity (camp, seminar, meeting, competition).
 - c. Unsportsmanlike conduct.
 - d. Public disturbance or nuisance.
 - e. Posting anything negative about USBC, Team USA, USOPC or International Bowling Federation on any social media outlet.
 - f. Failure to follow the dress code as designated by the Team Manager, at an official event or activity.
2. Level 2
 - a. Second offense of Level 1 Infraction.
 - b. Drunkenness or being under the influence of recreational drugs.
 - c. Fighting, public disturbance or nuisance.
 - d. Inappropriate pranks, jokes, or other activities, which endanger the safety of others.
3. Zero Tolerance
 - a. Prior offense(s) of Level 1 and/or 2 Infractions.
 - b. Using recreational drugs at an official competition, event or activity.
 - c. Using performance enhancing substances.
 - d. Engaging in any conduct that is criminal under any laws applicable
 - e. Purchasing, possessing or drinking alcoholic beverages, if under 21 years old.
 - f. Drunkenness at an official competition, event or activity.
 - g. Possession of/or taking/using illegal, banned drugs or controlled substances (includes performance enhancing substances).
 - h. Purchasing or providing alcoholic beverages to persons under the age of 21 years.
 - i. Sexual Harassment

Section F. Authority and Penalties for Conduct Infractions. The following are possible penalties/repercussions of behavior which violates this Code of Conduct.

1. Level 1 Infraction
 - a. Earlier curfew.
 - b. Verbal or written reprimand.
 - c. Performance of specified task(s), such as formal written and/or verbal apology or restitution.



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- d. Denial of the privilege to participate in any or all remaining team activity(s) at the event.
 - e. Confinement to room or other controlled area(s).
2. Level 2 infraction.
- a. Any of the penalties described under Level 1 infractions.
 - b. Being sent back to travel point of origin or home-base.
 - c. Probation for one (1) year.
 - d. Suspension from all Team USA Bowling (trials, training camps, etc.) for one (1) year.
 - e. Expulsion from the Team
3. Zero Tolerance infraction.
- a. Immediate suspension from official competition, event or activity.
 - b. Being sent back to travel point of origin or home base.
 - c. If infraction occurs before departure, privileges to travel with the Team and participate in an official competition, event or activity may be revoked.
 - d. Any of the items described under Level 2 infractions.
 - e. Revoking of uniform or other Team supplied items.
 - f. Expulsion from the Team.
 - g. Probation for two (2) years or more.
 - h. Suspension from all Team USA Bowling (trials, training camps, etc.) for (2) years or more.
 - i. Any other penalty that may be deemed appropriate for the particular violation.

Section G. Reporting

Any individual who believes a Team USA Member has committed a code of conduct violation may submit a report to the policy lead. Upon receipt of a potential code of conduct violation, the policy lead, or a disinterested individual if the policy lead has a conflict of interest, will investigate the claim and submit a report to the Executive Director. Following a majority vote of the Executive Director, High Performance Manager, and Team Coach, one or more of the penalties listed in Section F may be imposed.

An individual will have the opportunity for a hearing executed by a disinterested party for any determination which limits an individual's right to participate. The procedures in the USBC Bylaws Disciplinary Supplement will be followed.

Section H. Whistle-Blower

Any affiliated individual who reports, in good faith, a violation or potential violation of any policy is protected under USBC's Whistle-Blower Policy which is detailed in Article VI of the USBC Bylaws Due Process Supplement. USBC's Whistle-Blower Policy includes a No Retaliation statement.

Under no circumstances will an individual be subject to any disciplinary or retaliatory action for filing, in good faith, a report of a violation or potential violation of the Code of Conduct. However, filing known false or malicious reports will not be tolerated, and anyone filing such reports will be subject to appropriate disciplinary action.



Ethics Policy III – Conflict of Interest

Section A. Purpose

USBC is committed to sustaining an ethical organization free of conflicts of interest and perceived conflicts of interest. Each Affiliated Individual (as defined in Section B of the Introduction) has the responsibility to administer the affairs of USBC honestly and prudently, and to exercise their best care, skill, and judgment for the sole benefit of USBC. Those persons will exercise the utmost good faith in all transactions involved in their duties, and they will not use their positions with USBC or knowledge gained therefrom for their personal benefit. The interests of the organization must be the first priority in all decisions and actions. USBC requires that any of its Affiliated Individuals recognize, and attempt to avoid, activities or investments that involve, might appear to involve, or could result in a potential conflict of interest.

This policy does not attempt to provide an exhaustive list of every possible circumstance that might give rise to a conflict of interest, but provides examples of situations or “**transactions**” where potential conflicts of interest often arise. A “**transaction**” is any contract, transaction, agreement or relationship involving the sale or purchase of goods, services, or rights of any kind, the providing or receipt of a grant or loan, or the establishment of any other financial relationship with USBC.

Section B. Applicability of Policy

This Conflict of Interest Policy is applicable to all **USBC** Affiliated Individuals as defined in Section B of the Introduction.

Section C. Definitions

1. “**Conflict of Interest**” or “**Conflict**” exists when an Affiliated Individual’s activities interests, or relationships interfere with, influence, or have the potential to interfere with or influence his or her responsibilities on behalf of the **USBC** or undermine the interests of the **USBC**. The activities and interests of an Affiliated Individual’s relatives and close associates must also be considered when evaluating whether a conflict of interest exists. Relatives and close associates (RCAs) include spouses/domestic partners, children, siblings, parents, in-laws, close friends, and business partners.

A “**conflict of interest**” can exist in the context of athlete or team selection when an Affiliated Individual participates in a selection decision that involves or impacts an athlete who is an RCA of the Affiliated Individual or when an Affiliated Individual participates in a benefits or services allocation decision that directly impacts the Affiliated Individual or their RCAs.

2. As defined below, a conflict of interest may be actual, potential, or perceived:
 - a. **Actual Conflict of Interest** - An actual conflict of interest exists when an Affiliated Individual has an active relationship with a person or organization that may influence their decision making in their role with USBC.
 - b. **Potential Conflict of Interest** - A potential conflict of interest exists when an actual conflict of interest has not yet been established, but there is reasonable cause to believe that a future event may create a conflict of interest. An example of a potential conflict of interest is an Affiliated Individual that has an active relationship with a person or organization that is under consideration for a vendor contract with USBC. By contrast, if the vendor relationship is established, the Affiliated Individual would have an actual conflict of interest related to this vendor.
 - c. **Perceived Conflict of Interest** - A perceived conflict of interest exists when an Affiliated Individual does not have an active relationship with a person or organization, but it may appear to another individual that a connection between the two exists and has influenced a decision made by the Affiliated Individual. A perceived conflict of interest may also exist if an Affiliated Individual has disclosed a conflict of interest and has recused themselves from decision making but takes actions that make it appear that they were involved in the decision (e.g., the conflicted person recused themselves from a discussion about a particular decision but remained in the room while the discussion was ongoing). It is important to remember that perceived conflicts of interest are often seen by others as actual conflicts of interests.



Section D. Areas in Which Conflicts May Arise

Conflicts of interest often arise due to the relationships Affiliated Individuals have with the following third parties:

1. Persons or entities supplying goods and services to **USBC**;
2. Persons or entities leasing property or equipment to **USBC**;
3. Persons or entities with whom USBC is dealing or planning to deal in connection with the gift, purchase or sale of real estate, securities or other property;
4. Competing or affinity organizations;
5. Donors and others supporting **USBC**;
6. Agencies, organizations, and associations which affect the operations of **USBC**; or
7. RCAs and other employees of **USBC**.

Potential conflicts of interest often arise when Affiliated Individuals have an interest, directly or indirectly, with any persons or entities mentioned above. Examples of potential conflicts of interest are listed below. The list below is not intended to be an all-inclusive list of every instance that may create a potential conflict of interest, but, rather, is simply a sample of the types of relationships and activities that may give rise to a conflict of interest. If an Affiliated Individual or other disclosing individual has any question as to whether a relationship or activity may create a conflict of interest, a disclosure must be made.

Examples of potential conflicts of interest that should be disclosed are listed below:

1. An Affiliated Individual has personal relationships with other Affiliated Individuals who they regularly work alongside or who their work affects.
EXAMPLE: Two USBC board members who are serving at the same time are married.
EXAMPLE: An USBC board member is the parent of a current national team athlete.
2. Affiliated Individual or an RCA owns stock or holds debt or other proprietary interests in any third party dealing or who may potentially deal with USBC.
EXAMPLE: A USBC board member owns a 70% interest in a company seeking to enter into a contract with USBC to provide consulting services.
3. Affiliated Individual or an RCA owns a business, maintains a second job, or provides goods or services under a provider, contractor, or consulting agreement, where by the outside business provides goods or services to USBC, the USOPC, or any other NGB.
EXAMPLE: USBC is contemplating entering into an agreement with an HR consulting company owned by a USBC employee's husband.
4. Affiliated Individual or an RCA holds a position of executive, officer or director, participates in the management of, or is otherwise is employed (or formerly employed) by any third party dealing with USBC.
EXAMPLE: A USBC board member is the CEO of a technology company negotiating a contract with **USBC** to provide IT services.
5. Affiliated Individual uses **USBC**'s time, personnel, equipment, supplies, or goodwill for anything other than **USBC**-approved activities, programs, and purposes.
EXAMPLE: A **USBC** employee uses a **USBC** vehicle for a personal road trip.
6. Affiliated Individual solicits gifts or gratuities using their **USBC** role or accepts personal gifts, loans, gratuities, or discounts from third parties, including situations that may or may not constitute a violation of USBC's Gift & Entertainment Policy. No personal gift of money should ever be accepted.
EXAMPLE: A **USBC** employee using her position at **USBC** to obtain box seats to a sporting event from a vendor for personal use.
EXAMPLE: Accepting tickets to an NFL game worth \$250 from a business seeking to obtain a contract to provide landscaping services for **USBC** headquarters.
EXAMPLE: A **USBC** board member gets paid a commission if **USBC** enters into a particular contract with a third party.



7. Affiliated Individual or an RCA acts as an agent, representative, or consultant to a business whose interests may conflict with the interests of USBC.
EXAMPLE: A USBC board member agrees to promote another NGB in negotiations with potential sponsors or licensees.
8. Affiliated Individual or an RCA has a business relationship with a sponsor, supplier, licensee, or vendor of USBC (for a current list of USBC sponsors, suppliers, and licensees, go to **[URL]**).
EXAMPLE: A USBC employee's spouse provides legal services to a USBC sponsor.
9. Affiliated Individual awards USBC business to, or provides favorable treatment to, a business owned or controlled by a volunteer or an RCA.
EXAMPLE: USBC is contemplating entering into a contract for landscaping services with a company because the landscaping company is owned by an employee's brother.
10. Affiliated Individual drafts selection procedures or participates and/or votes within a discretionary selection committee of **USBC** when they have a relationship with an athlete who is potentially impacted by the selection procedures (e.g., as coach, trainer, parent, etc.) or when Affiliated Individual might benefit directly or indirectly from the selection method.
EXAMPLE: National Selection Committee member participating in a decision to select an athlete on USBC's team for World Championships or major international competition when the committee member is athlete's current coach or family member.
EXAMPLE: The athlete representative assisting with drafting, voting on, and/or signing the procedures is also competing for a spot on the team for which the procedures are written.
11. Affiliated Individual engages in activities or maintains interests and relationships that interfere with or influence, or have the potential to interfere with or influence, the satisfactory performance of their responsibilities on behalf of USBC or undermine the interests of USBC.
EXAMPLE: A USBC board member has a significant client who owns or operates a facility being considered as the host of a USBC event.
EXAMPLE: An Affiliated Individual serves on a hearing panel or appeal panel involving discipline against a member of the Affiliated Individual's club / team / family.
EXAMPLE: An athlete is the potential recipient of benefits or services that are being allocated by USBC and participates in the allocation decision.

Section E. Interpretation of This Policy

The examples listed in Section D are not exhaustive. Affiliated Individuals should disclose all relationships and activities which may give rise to a potential conflict of interest, whether or not listed expressly in Section D.

Disclosure of a conflict or potential conflict of interest does not necessarily prohibit involvement in the disclosed activity or with the USBC. For example, the conflict might not be material enough to be of practical importance, or if it is material, it might be possible for the USBC and Affiliated Individual to implement appropriate mitigating measures upon full disclosure of all relevant facts and circumstances. However, it is USBC's policy that the existence of any of the interests described or similar in nature to those described in Section D will be disclosed before any transaction is consummated or any vote taken on an action, contract, relationship, or decision that would give rise to the potential conflict of interest. It is the continuing responsibility of each Affiliated Individual to scrutinize his/her transactions, outside business interests, and relationships for potential conflicts and to immediately make such disclosures.

Section F. Conflict Disclosure Statements

1. All Affiliated Individuals must comply with the Conflicts of Interest Policy and proactively disclose actual or potential conflicts of interest as they arise.



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2. All members of the following groups of Affiliated Individuals must annually sign and submit to their respective Policy Lead a standardized disclosure form (see appendix 1) to disclose any actual or potential conflicts of interest:
 - a. USBC Employees
 - b. Board members and officers
 - c. Committee members
 - d. Volunteers and contractors with substantial decision-making authority

Hearing panel and task force members are also required to complete a conflicts disclosure prior to beginning their duties.

3. Any new USBC employee will submit a conflict of interest disclosure statement within 14 days of his or her hiring by USBC to fulfill the annual disclosure requirement.
4. Any other new Affiliated Individuals who are required to submit an annual disclosure will submit a conflict of interest disclosure statement by the earlier of 14 days after his or her appointment or his or her first board, committee, or task force meeting to fulfill the annual disclosure requirement. In no event will an Affiliated Individual participate in any decisions to commit USBC to a proposed transaction or in athlete or team selection procedures prior to submission of his or her conflict of interest disclosure statement.

Any actual or potential conflict of interest must be disclosed. Each conflicts disclosure will be reviewed and addressed as outlined in Section I.

USBC will maintain copies of all disclosures submitted in accordance with the document retention policies and procedures.

Section G. Periodic Statements and Updates

1. In addition to the required annual disclosures, each employee, board member or officer, committee member, and volunteer or contractor with substantial decision-making authority will submit to their respective lead an updated disclosure describing any new potential conflicts of interest or material changes to a previously disclosed conflict of interest as they arise. USBC will maintain copies of all periodic statements or updates submitted in accordance with the document retention policies and procedures.
2. Board and committee members must also review meeting agendas before each meeting to determine if, for any discussion item, they have any potential conflicts of interest that should be disclosed under this policy.
 - a. At the beginning of each meeting, each board or committee member should state the agenda items for which he or she has such a potential conflict of interest. When those agenda items are addressed by the board or committee, the conflicted board or committee member may need to recuse themselves for discussions and/or board or committee votes.
 - b. Board and committee members who become aware of a conflict mid-discussion, such as during a conversation that evolves to include content that presents a conflict that was not apparent from the agenda item's title, should recuse themselves at that time.

Recusal means the board or committee member must leave the room or the teleconference entirely and return only when the discussion or vote on the agenda item is completed. The minutes should reflect each disclosure and recusal.

Section H. Procedures for Reviewing and Managing Potential Conflicts of Interest

1. **Review of Disclosures** – The Policy Lead collects and reviews conflict of interest disclosures and forwards any actual, potential or perceived conflicts of interest to USBC's General Counsel to determine any actions required to manage the conflict of interest. Conflict of interest disclosures for the Executive Director and Board of Directors are provided to the Legal & Ethics Committee for review. Conflicts will be addressed as follows:
 - a. The Policy Lead will review the information provided by the Affiliated Individual in their disclosure, requesting additional information from the Affiliated Individual if necessary to fully understand the nature of the conflict.
 - b. The Policy Lead will determine whether an actual or apparent conflict of interest exists.
 - c. If the Policy Lead determines that an actual or apparent conflict of interest exists, they will forward to USBC's Legal Counsel to determine whether there are mitigating measures that can



be implemented to alleviate the conflict and/or what steps the interested individual and/or USBC must take or not take in order to avoid the conflict.

The disclosure of an actual, potential or perceived conflict of interest will not necessarily prohibit involvement in the disclosed activity or with USBC. Rather, each disclosure will be reviewed individually and actions may be recommended to protect the Affiliated Individual, **USBC**, and the integrity of the decisions made by the Affiliated Individual and **USBC** from actual, potential, and perceived conflicts of interests. These actions may include limitation of involvement, separation from certain **USBC** activities, or requests to cease the activity in question.

- d. All direction for managing conflicts will be discussed with the Affiliated Individual directly. If a material conflict is identified (whether actual, potential or perceived) for the **Executive Director**, board member, or Designated Committee (as defined by the USOPC Bylaws) member, the Rules & Ethics Committee must communicate, in writing, its direction on conflict management to the individual.
2. **With Respect to Proposed USBC Transactions or Business** - In the event a potential conflict of interest exists with respect to a proposed transaction or arrangement, then promptly and before any decision is made regarding the proposed transaction or arrangement, the potential conflict of interest will be addressed as follows:
 - a. The interested person may make a presentation to the Legal & Ethics Committee, which may be convened telephonically, regarding the transaction or arrangement involving the potential conflict of interest.
 - b. The interested person will then recuse themselves from any and all discussion and approval (if applicable) of the conflict of interest.
 - c. The Legal & Ethics Committee will determine whether an actual or apparent conflict of interest exists. For transactions, the Legal & Ethics Committee may consider whether a competitive bid or competitive evaluation exists.
 - d. If the Legal & Ethics Committee determines an actual or apparent conflict of interest exists, it will be discussed with USBC's Legal Counsel to determine whether there are mitigating measures that can be implemented to alleviate the conflict and/or what steps the interested individual and/or USBC must take or not take in order to avoid the conflict. The Legal & Ethics Committee may determine in some cases that the NGB cannot engage in the transaction or arrangement at all due to the conflict or potential conflict of interest.
 3. **With Respect to Drafting Selection Procedures and Athlete/Team Discretionary Selection**
 - a. The following more particularized disclosure requirements and procedures apply in the context of drafting selection procedures and athlete/team discretionary selection decisions in order to ensure that no Affiliated Individual participating in the process has a conflict of interest that will impact his/her ability to make a fair and unbiased decision in the athlete or team selection process.
 - b. Any Affiliated Individual involved in the drafting of procedures, including the athlete representative, or on a discretionary selection committee who has a potential conflict of interest must disclose it to the Director of Rules and Compliance for review. The following process will be followed:



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- 1) The Interested Person may make a presentation to the Legal & Ethics Committee, which may be convened telephonically, regarding the potential conflict of interest.
 - 2) The interested person will then recuse themselves from any and all discussion regarding the potential conflict of interest.
 - 3) The Legal & Ethics Committee will determine whether an actual or apparent conflict of interest exists
 - 4) If the Legal & Ethics Committee determines that a conflict of interest exists, it will either mandate the individual's recusal from the process or determine to what extent, if any, that individual can participate in the process. The Legal & Ethics Committee may determine that the individual can still participate in the drafting of the procedures or be included in the discussions for discretionary selection of a team, but not take part in any sign-off, vote, or decision. For example, a national team coach or high performance director may provide information to the selection committee so long as such information is provided in a fair and unbiased manner and the committee member who disclosed the conflict of interest does not vote toward the final decision.
 - 5) Under no circumstances will a person with an actual or potential conflict attempt to unduly influence other members of the committee in the selection process.
- c. If the Affiliated Individual is recused and a vacancy on the committee exists, either in the drafting process or on the discretionary selection committee, **USBC** will use its best reasonable efforts to fill that vacancy. If a vacancy results in the athlete representative position, another athlete representative who meets the qualifications for that committee will be appointed and approved by a representative group of athletes.
4. **With Respect to Seating Hearing Panels**
- a. The following more particularized disclosure requirements and procedures apply in the context of seating hearing panels in order to ensure that no Affiliated Individual participating in the process has a conflict of interest that will impact his/her ability to make a fair and unbiased decision in the hearing process to resolve a grievance.
 - b. Any Affiliated Individual appointed to a hearing panel, including the athlete representative, is obligated to disclose all actual or potential conflicts of interest prior to being appointed to a hearing panel. The Legal & Ethics Committee will solicit and review potential panel members' disclosures and make a determination on whether they are a disinterested party for the matter under review.
 - c. Hearing panel appointments are subject to an objection from either the complaining party or responding party on the grounds of a conflict of interest which is believed to be disqualifying. Objections will be handled using the following process:
 - 1) The objecting party may report the alleged conflict of interest to the Legal & Ethics Committee within 15 days of notification of hearing panel appointment.
 - 2) The Legal & Ethics Committee will review the objecting party's report and, taking all investigative steps necessary, determine whether an actual or potential conflict of interest exists.
 - 3) If the Legal & Ethics Committee determines that an actual or potential conflict of interest exists, the hearing panel member will be disqualified and a new hearing panel member will be appointed to replace the disqualified hearing panel member. The replacement hearing panel member shall be required to complete all disclosure requirements and is similarly subject to challenge by the parties as outlined in this section.

Section I. Reporting Violations of the Conflicts of Interest Policy

1. Any individual with a good faith belief that an Affiliated Individual has a conflict of interest may notify the respective Policy Lead of such perceived conflict by emailing a report to designated email address. Furthermore, should any Affiliated Individual become aware of any undisclosed conflict of interest, or any conflict of interest not fully disclosed, they should make full disclosure of their knowledge of the potential conflict of interest involved to the respective Policy Lead by emailing a report to the designated email address. Reports may be made anonymously, if desired.
2. Upon receipt of a conflict of interest report, the policy lead, or a disinterested individual if the policy lead has a conflict of interest, will investigate the claim and make a determination. An individual will have the opportunity for a hearing executed by a disinterested party for any



determination which limits an individual's right to participate. The procedures in the USBC Bylaws Disciplinary Supplement will be followed.

3. All good faith reports of violations of this policy are protected under the provisions of the USBC's Whistleblower/Anti-Retaliation Policy. USBC has zero tolerance for retaliation against an individual for filing a good faith report of a violation or potential violation. Consult USBC's Whistleblower/Anti-Retaliation Policy for additional information.

Section J. Violations of the Conflicts of Interest Policy

1. If the Legal & Ethics Committee has reasonable cause to believe an Affiliated Individual has failed to disclose an actual or potential conflict of interest, it will promptly inform the Affiliated Individual of the basis for such belief and afford the member an opportunity to explain the alleged failure to disclose.
2. If, after hearing the Affiliated Individual's response and after making further investigation as warranted by the circumstances, the Legal & Ethics Committee determines the Affiliated Individual has failed to disclose the conflict or potential conflict of interest, it will take appropriate disciplinary and corrective action. The Legal & Ethics Committee will communicate all such decisions in writing to the Affiliated Individual. The Legal & Ethics Committee's decision will be final.
3. In the event that a member of the Legal & Ethics Committee is not disinterested in a particular alleged violation under review, that member shall recuse themselves from the investigation and decision-making process. In all cases, matters under review shall be reviewed by disinterested parties.
4. While any such failure to disclose a conflict or potential conflict of interest is under investigation by the Legal & Ethics Committee, the Affiliated Individual will be precluded from engaging in further decisions of **USBC** that bear any relation whatsoever to the matter that is the subject of the conflict or potential conflict of interest.



Ethics Policy IV – Gifts and Entertainment

Section A. Purpose

USBC is committed to sustaining an ethical workplace free of conflicts of interest and perceived conflicts of interest. USBC therefore has adopted this Gifts and Entertainment Policy to provide instruction to applicable individuals regarding how to handle offers of gifts or other forms of entertainment from individuals or companies that do business with, or are interested in doing business with, USBC. Additionally, it provides instruction on the NGB extending gifts to third parties.

This policy should not be considered in any way as an encouragement to make, solicit or receive any type of gift or entertainment. Further, USBC will not under any circumstances permit or authorize participation in any business gifts or entertainment that might be considered lavish, inappropriate or illegal.

Section B. Applicability of Policy

This Gifts and Entertainment Policy is applicable to affiliated individuals as indicated in Section B of the Introduction, as well as their spouses and immediate family members.

Questions regarding any of the requirements set forth in this policy or about a specific situation related to gifts and entertainment should be referred to the specific Policy Lead.

Section C. Receiving Business Courtesies

1. Employees and Immediate Family Members
 - a. Any gift or invitation received either anonymously or from vendors, business partners or other persons or entities that have or are seeking a business relationship with IBC entities may be accepted on behalf of the entire organization.
 - b. Gifts shall include bowling balls or accessories, gift certificates, services, travel, hotel stays, entertainment, alcohol, or other perks and prizes and may not exceed \$100 per person, per year, without the prior approval of the Executive Director.
 - c. Normal business courtesies such as luncheons or dinners, when they are proper and consistent with regular business practices, may be accepted with approval of the Executive Director.
2. USBC Board, Committee, Task Force and Hearing Panel members - May receive gift/favor of only de minimis value. These gifts/favors should not compromise, in any way, the discussions and/or actions taken in regard to USBC. If you are unsure whether you may accept a gift/favor, or if you have any question whether it is de minimis, you should consult with USBC's Legal and Ethics Committee Chair.
3. Disclosure – Affiliated individuals must promptly disclose any and all gifts or invitations received in their capacity as an employee or representative of USBC through the Gift Disclosure Form found [here](#).

Section D. Extending Business Courtesies - There may be times when an affiliated individual wishes to extend a gift or an invitation to attend a social event (e.g., reception, meal, sporting event, or theatrical event) to a current or prospective business partner to further or develop a business relationship. Gift certificates may be given but cash or financial instruments (e.g., checks, stocks) in any amount may never be given.

Any business courtesy must be approved by the policy lead prior to being given out.

Section E. Government Employees

The giving of gifts to federal, state, and local government employees is governed by a complex set of rules that is typically agency specific. Generally, the giving of gifts to government employees is very limited or prohibited. Before offering a gift to a government employee, of any value, you must receive the approval of the Executive Director in advance and in writing.



Section F. Policy Violations

1. Any USBC employee found to have violated this policy will be referred to HR and subject to appropriate disciplinary action, up to and including termination of employment.
2. Any USBC Board or Committee member found to have violated this policy will be referred to the USBC President and subject to appropriate disciplinary action, up to and including removal from the position.



Ethic Policy V – Child Protection

As required by Section 220524(a)(12) of the Act, USBC prohibits any individual who is an employee, contractor, or agent of the USBC from assisting a member or former member in obtaining a new job (except for the routine transmission of administrative and personnel files) if the individual knows that the member or former member violated the policies or procedures of the U. S. Center for SafeSport related to sexual misconduct or was convicted of a crime involving sexual misconduct with a minor in violation of applicable law or the policies or procedures of the U. S. Center for SafeSport.