



USA SHOOTING CONFLICT OF INTEREST POLICY

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1. Purpose

USA Shooting is committed to sustaining an ethical organization and culture, and a reputation for fairness, free of conflicts of interest and perceived conflicts of interest. Each Affiliated Individual (as defined below) has the responsibility to administer the affairs of USA Shooting honestly and prudently, and to exercise their best care, skill, and judgment for the sole benefit of USA Shooting. Those persons will exercise the utmost good faith in all transactions involved in their duties, and they will not use their positions with USA Shooting or knowledge gained therefrom for their personal benefit. The interests of the organization must be the first priority in all decisions and actions. USA Shooting requires that any of its Affiliated Individuals recognize, 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.

2. Scope of Policy

This Policy applies to all USA Shooting Affiliated Individuals. Where reasonable, USA Shooting contractors may be required to comply with this policy in their contracts.

3. Definitions

“Affiliated Individuals” include, but are not limited to, members of USA Shooting’s Board of Directors (the Board of USA Shooting), officers, committee members, task force members, hearing panel members, employees, athletes, coaches, team leads, judges or officials and volunteers.

“Relatives and Close Associates” include spouses/domestic partners, children, siblings, parents, in-laws, close friends, and business partners.

A **“Conflict of Interest”** or **“Conflict”** exists when an Affiliated Individual’s personal activities, interests, or relationships improperly interfere with or influence his or her responsibilities on behalf of USA Shooting or undermine the interests or reputation of USA Shooting. As noted throughout this Policy, we must disclose both actual Conflicts *and* situations that would give even the appearance of a Conflict. In addition, the activities and interests of an Affiliated Individual’s **Relatives and Close Associates** must also be disclosed when evaluating whether a Conflict of Interest exists.

A **“transaction”** is any contract, 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 USA Shooting.

“Recusal” means the Affiliated Individual must not participate in the discussion, decision making and/or vote on a particular subject.

4. Types of Conflicts

Conflicts occur when you have a relationship or enter into a transaction that puts your interests, or appears to put your interests, above those of USA Shooting or its stakeholders. That includes using your position with USA Shooting to unfairly provide a benefit to yourself. Below are set out a number of different types of Conflicts that an Affiliated Individual might encounter in the course of their work with USA Shooting, along with specific examples of situations that must be reported. In some cases, simply being transparent about a Conflict will be sufficient to avoid problems. In others, you may be advised to take remedial actions or to avoid a situation or transaction altogether.

- a) **You have an interest in an entity that wishes to supply goods or services to USA Shooting.** A Conflict of Interest will arise if you, or a business that you own, control, are employed by, invest in, or otherwise have a financial interest in, wishes to provide goods or services to USA Shooting. This type of situation raises questions about whether you are directing USA Shooting to engage in transactions that will benefit your personal wealth or success at the expense of USA Shooting or its stakeholders. It also may raise questions about whether

the entity that you are affiliated with will provide the best products and services at the best prices. While it is not necessarily prohibited for such an entity to do business with USA Shooting, it is critical that you disclose the relationship so that the situation can be evaluated and neutral people can make an informed procurement decision.

Examples of situations that must be disclosed include the following:

EXAMPLE: A USA Shooting board member owns a material interest in a company seeking to enter into a contract with USA Shooting to provide consulting services.

EXAMPLE: A USA Shooting board member owns, manages or is employed by a facility that USA Shooting is thinking of leasing on either a short-term or long-term basis, or is being considered as the host of a USA Shooting event.

EXAMPLE: A USA Shooting board member is the CEO of a technology company negotiating a contract with USA Shooting to provide IT services.

EXAMPLE: A USA Shooting board member gets paid a commission if USA Shooting enters into a particular contract with a third party.

EXAMPLE: A USA Shooting board member agrees to act as an agent for and promote another sport organization or entity in negotiations with potential sponsors or licensees.

EXAMPLE: A USA Shooting Committee member provides legal or business advisory services to a USA Shooting sponsor.

EXAMPLE: A USA Shooting board member has a significant client who owns or operates a facility being considered as the host of a USA Shooting event.

- b) **A Relative or Close Associate has potential business or other dealings with USA Shooting.** A potential Conflict of Interest will arise if your relatives or close associates have business with USA Shooting, as it may, at a minimum, appear that you will show favoritism to such a person.

Examples of situations that must be disclosed include the following:

EXAMPLE: USA Shooting is contemplating entering into an agreement with a HR consulting company at which a USA Shooting employee's husband holds a senior position.

EXAMPLE: A USA Shooting employee's daughter-in-law provides legal or business advisory services to a USA Shooting sponsor.

EXAMPLE: USA Shooting is contemplating entering into a contract for landscaping services with a company because the landscaping company is owned by an employee's brother.

EXAMPLE: Two USA Shooting board members who are serving at the same time are married or otherwise related. [Note: while such a situation may be acceptable, it may also raise questions about the independence of both individuals, and therefore the organization should be aware of the situation and review it]

- c) **You will be making decisions that impact opportunities to compete, access facilities, discipline, or take other actions that bear on fairness or competitive integrity, and such decisions may impact yourself or Relatives and Close Associates.** When you have the authority to make choices related to competition that can provide a direct or indirect benefit to you, your family members, your friends, or teams that you participate on, coach or officiate, there will at a minimum be an appearance that your choices will be biased. It is therefore critical to the integrity of USA Shooting that you disclose such relationships so that USA Shooting can decide whether you need to recuse yourself from a particular decision or from a particular role within the organization.

Examples of situations that must be disclosed include the following:

EXAMPLE: A USA Shooting board member is the parent of a current national team athlete or athlete with potential to make the national team.

EXAMPLE: A USA Shooting employee is participating in a decision to select an athlete on USA Shooting's team for World Championships or major international competition when the USA Shooting employee is the athlete's current coach or family member.

EXAMPLE: An athlete representative assisting with drafting, voting on, and/or signing selection procedures is also competing for a spot, or coaching an athlete who is competing for a spot, on the team for which the procedures are written.

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 USA Shooting, the USOPC or other funding organizations, and participates in the allocation decision.

- d) **You are offered gifts, entertainment, or other personal benefits from someone who might benefit from decisions you make on behalf of USA Shooting.** When you accept a gift, entertainment, or other benefit from

someone that may benefit from decisions you make on behalf of USA Shooting, you may create the appearance that your choices were influenced by your personal receipt of that benefit. For this reason, USA Shooting maintains a Gifts and Entertainment Policy that must be adhered to by all Affiliated Individuals. Following this Policy, and making disclosures where required or appropriate, is another way in which we can avoid Conflicts of Interest. Please note that it is never appropriate for an Affiliated Individual to request a gift or a favor from someone who may benefit from decisions made by USA Shooting.

Examples of situations that may be prohibited by the Gifts and Entertainment Policy and/or that may require disclosure include the following:

EXAMPLE: A USA Shooting employee uses, or appears to be using, her position at USA Shooting to obtain box seats to a sporting event from a vendor for personal use.

EXAMPLE: A USA Shooting employee accepts tickets to an NFL game worth \$250 from a business seeking to obtain a contract to provide landscaping services for USA Shooting headquarters.

EXAMPLE: USA Shooting employee participating in a decision to select an athlete on USA Shooting's team for a World Championship or major international competition accepts a gift of an antique rifle from one of the athletes who wishes to be selected.

The examples set out above are not intended to be an all-inclusive list of every instance that may create a potential Conflict of Interest, but, rather, they are simply a sample of the types of relationships and activities that may give rise to a Conflict of Interest or perceived 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.

Finally, although not a Conflict of Interest *per se*, misuse of USA Shooting assets is prohibited. Affiliated Individuals may not use USA Shooting's time, personnel, equipment, supplies, or goodwill for anything other than USA Shooting-approved activities, programs, and purposes.

5. Interpretation of This Policy

The examples listed in Section 4 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 4. When in doubt as to whether a relationship or situation could create a conflict of interest, Affiliated Individuals should err on the side of disclosing the relationship or situation to USA Shooting as outlined in the Policy.

Disclosure of a conflict or potential conflict of interest does not necessarily prohibit involvement in the disclosed activity or with USA Shooting. For example, the conflict might not be material enough to be of practical importance, or if it is material, it might be possible for USA Shooting and an Affiliated Individual to implement appropriate mitigating

measures upon full disclosure of all relevant facts and circumstances. However, it is USA Shooting's policy that the existence of any of the interests described or similar in nature to those described in Section 4 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

6. Conflict of Interest Disclosure Statements

All Affiliated Individuals must comply with this Policy and proactively disclose actual or potential conflicts of interest as they arise. Affiliated Individuals should utilize the Conflict of Interest Disclosure Statement ("Disclosure Statement") located [here](#).

In addition, all members of the following groups of Affiliated Individuals must, on at least an annual basis, sign and submit to the USA Shooting Ethics Committee ("Ethics Committee"), via email at Ethics@usashooting.org or via an approved submission portal such as DocuSign, the Disclosure Statement to disclose any actual or potential conflicts of interest:

- USA Shooting Employees
- Board members and officers
- Committee members
- Volunteers and contractors with substantial decision-making authority

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

Any new USA Shooting employee will submit a Disclosure Statement within 14 days of his or her hiring by USA Shooting to fulfill the annual disclosure requirement. Any other new Affiliated Individuals who are required to submit an annual disclosure will submit a Disclosure Statement as a requirement of the application and/or vetting process, or by the earlier of 14 days after his or her appointment or in advance of 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 USA Shooting to a proposed transaction or in athlete or team selection procedures prior to submission of his or her Disclosure Statement.

Any actual or potential conflict of interest must be disclosed. Each Disclosure Statement will be reviewed and addressed by the Ethics Committee as outlined in Section 8.

USA Shooting will maintain copies of all Disclosure Statements submitted in accordance with the document retention policies and procedures established by USA Shooting.

7. Periodic Statements and Updates

In addition to the required annual disclosures outlined above, Affiliated Individuals will submit to the Ethics Committee an updated Disclosure Statement describing any new potential conflicts of interest or material changes to a previously disclosed conflict of interest as they arise. An individual may use the Disclosure Statement located here. (insert hyperlink to form) USA Shooting will maintain copies of all periodic statements or updates submitted in accordance with the document retention policies and procedures of USA Shooting.

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. 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. 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.

If an individual has not recused themselves, but a majority of the Board or committee concludes that the individual has a conflict that warrants recusal, they may require recusal. 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.

8. Procedures for Reviewing and Managing Potential Conflicts of Interest

Except as otherwise required by this Policy, USA Shooting will collect and review conflict of interest disclosures, and document any actual or potential conflicts of interest, including possible omissions. The Ethics Committee will review all disclosures with actual or potential conflicts of interest, including possible omissions and determine any actions required to manage the conflict of interest. Conflict of Interest Disclosure Statements for the CEO and Board of Directors will be provided directly to the Ethics Committee for review.

Conflicts generally will be addressed as follows:

- i. USA Shooting designated staff or Ethics Committee, as applicable, will review the information provided by the Affiliated Individual in their Disclosure Statement, requesting additional information from the Affiliated Individual if necessary to fully understand the nature of the Conflict.
- ii. USA Shooting designated staff or Ethics Committee, as applicable, will determine whether an actual or apparent Conflict of Interest exists or may have been omitted.

- iii. If the USA Shooting Ethics Committee determines that an actual or apparent Conflict of Interest exists, they will determine whether there are mitigating measures that can be implemented to alleviate the Conflict and/or what steps the interested individual and/or USA Shooting must take or not take in order to avoid the Conflict.

The disclosure of an actual or potential Conflict of Interest will not necessarily prohibit involvement in the disclosed activity or with USA Shooting. Rather, each disclosure will be reviewed individually and actions may be recommended to protect the Affiliated Individual, USA Shooting, and the integrity of the decisions made by the Affiliated Individual and USA Shooting from actual, potential, and perceived Conflicts of Interests. These actions may include limitation of involvement, separation from certain USA Shooting activities, or requests to cease the activity in question.

- iv. All direction for managing Conflicts will be discussed with the Affiliated Individual directly. If a material Conflict is identified (whether actual or potential) for the CEO, board member, or Designated Committee (as defined by the USA Shooting Bylaws) member, the Ethics Committee must communicate, in writing, its direction on Conflict management to the individual.

The following subsections set out procedures that will apply with respect to specific types of Conflicts.

a) With Respect to Proposed USA Shooting 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:

- i. The interested person may make a presentation to the Ethics Committee, which may be convened telephonically, regarding the transaction or arrangement involving the potential Conflict of Interest.
- ii. The interested person will then recuse themselves from any and all discussion and approval (if applicable) of the Conflict of Interest.
- iii. The Ethics Committee will determine whether an actual or apparent Conflict of Interest exists. For transactions, the Ethics Committee may consider whether a decision was made based on a competitive bid or competitive evaluation process (e.g., was the decision made as the result of a competitive process in which the interested party was not a decisionmaker).
- iv. If the Ethics Committee determines that an actual or apparent Conflict of Interest exists, it will determine whether there are mitigating measures that can be implemented to alleviate the Conflict and/or what steps the interested individual and/or USA Shooting must take or not take in order to avoid the Conflict. The Ethics

Committee may determine in some cases that USA Shooting cannot engage in the transaction or arrangement at all due to the Conflict or potential Conflict of Interest

b) With Respect to Drafting Selection Procedures and Athlete/Team Discretionary Selection

Should a potential Conflict of Interest arise in connection with an Affiliated Individual's participation in the drafting of selection procedures or sitting on an athlete/team discretionary selection committee, the following process will be followed:

- i. The interested person may voluntarily recuse themselves from further participation in the relevant activity.
- ii. Should the interested person wish to continue participation, they may make a presentation to the Ethics Committee, which may be convened telephonically, regarding the potential Conflict of Interest.
- iii. The interested person will recuse themselves from any and all discussion regarding the potential Conflict of Interest until the Ethics Committee has made its determination.
- iv. The Ethics Committee will determine whether an actual or apparent Conflict of Interest exists.
- v. If the 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 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 manager, 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.
- vi. 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.

If the Affiliated Individual is recused and a vacancy on the committee exists, either in the drafting process or on the discretionary selection committee, USA Shooting will use its best reasonable efforts to fill that vacancy. If a recusal results in a vacancy in the athlete representative position, another athlete representative who meets the qualifications for that committee will be appointed and approved by the USA Shooting Athlete's Advisory Council ("AAC"), as outlined in the USA Shooting Bylaws and AAC Bylaws.

c) With Respect to Seating Hearing Panels

The following specific 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.

Any Affiliated Individual who is identified by the USA Shooting Nominating and Governance Committee as a potential hearing panel appointee will be obligated to disclose all actual or potential Conflicts of Interest prior to being appointed to a hearing panel. The Ethics Committee will review potential panel members' Disclosure Statements and make a determination on whether they are a disinterested party for the matter under review.

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 Ethics Committee withing seven (7) days a following the parties' notification of hearing panel appointment.
2. The 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 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.

9. Reporting Violations of the Conflicts of Interest Policy

Any individual with a good faith belief that an Affiliated Individual has a Conflict of Interest may notify the USA Shooting Ethics Committee of such perceived conflict by email at Ethics@usashooting.org. 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 USA Shooting's Ethics Committee by email at Ethics@usashooting.org. Reports may be made anonymously, if desired.

All good faith reports of violations of this policy are protected under the provisions of the USA Shooting Whistleblower and Anti-Retaliation Policy. USA Shooting has zero tolerance for retaliation against an individual for filing a good faith report of a violation or potential violation. Retaliation means any adverse or discriminatory action, or the threat of an adverse or discriminatory action, including removal from a training facility, reduced

coaching or training, reduced meals or housing, and removal from competition, carried out against a protected individual as a result of any communication, including the filing of a formal complaint, by the protected individual or a parent or legal guardian of the protected individual relating to the allegation of physical abuse, sexual harassment, or emotional abuse, with— (A) the U.S. Center for SafeSport; (B) a coach, trainer, manager, administrator, or official associated with the corporation; (C) the Attorney General; (D) a Federal or State law enforcement authority; (E) the Equal Employment Opportunity Commission; or (F) Congress. *For more information about the definition of retaliation and USA Shooting's zero tolerance approach to retaliation, please see the USA Shooting Whistleblower and Anti-Retaliation Policy.*

10. Violations of the Conflicts of Interest Policy

If the 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.

If, after hearing the Affiliated Individual's response and after making further investigation as warranted by the circumstances, the 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 Ethics Committee will communicate all such decisions in writing to the Affiliated Individual. The Ethics Committee's decision will be final.

In the event that a member of the 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.

While any such failure to disclose a Conflict or potential Conflict of Interest is under investigation by the Ethics Committee, the Affiliated Individual will be precluded from engaging in further decisions of USA Shooting that bear any relation whatsoever to the matter that is the subject of the Conflict or potential Conflict of Interest.

11. USA Shooting Resources

The USA Shooting Ethics Committee is responsible for this policy and its enforcement. The Chair of the USA Shooting Ethics Committee can be contacted with any questions about this policy via email at Ethics@usashooting.org.

12. Additional Resources

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

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