

US Olympic & Paralympic Committee Policy



Policy Name: Anti-Bribery and Anti-Corruption Policy

Date of Issuance: April 15, 2026

Policy Owner: Chief Ethics and Compliance Officer

Applies to: All USOPC Board Members, Committee Members, Staff, and Volunteers

Purpose: To support a culture of strong ethical conduct and protect the integrity of the USOPC and the broader Olympic and Paralympic movement, the Anti-Bribery and Anti-Corruption Policy defines bribery and the anti-corruption principles all individuals affiliated with USOPC must follow and provides guidance to assist in identifying and reporting instances of bribery and corruption.

Policy Statement: The United States Olympic & Paralympic Committee believes in promoting and sustaining a culture of integrity throughout the U.S. Olympic and Paralympic movement. To that end, the USOPC requires that all USOPC Team Members and other community members recognize and avoid any activity that constitutes bribery or corruption under international, federal, and state laws, including the Foreign Corrupt Practices Act (FCPA).

A violation of anti-bribery and anti-corruption laws can lead to severe civil and/or criminal penalties for both the USOPC and the USOPC Team Member(s) and/or third parties involved. It is imperative that USOPC Team Members, Board and committee members, third parties, and volunteers understand their obligations under this policy.

1. Definitions

- A. A “bribe” is anything of value or any other inducement provided to or accepted by an individual or entity in an attempt to persuade that individual or entity to act in one’s favor, for personal or business reasons. A bribe may be directed toward a government official or a private sector individual or entity. Under U.S. federal law, it is illegal to offer or accept government or private sector bribes.
- B. “Corruption” is the abuse of power, for personal gain, by an official or an employee entrusted with decision-making authority.
- C. “Covered Individual” includes all USOPC Team Members (employees and temporary employees hired through a staffing agency), board members, officers, committee members, task force members, hearing panel members, and any other volunteers.
- D. “Government Official” means: (i) any officer or employee of a national, regional, local, or municipal government or any department or agency thereof; (ii) any officer or employee of a state-owned or state-controlled enterprise; (iii) any officer, employee, or representative of a public international organization; (iv) any political party, party official, or candidate for public office; and (v) any person acting in an official capacity on behalf of any of the foregoing.

For purposes of this policy, requests or benefits involving a Government Official’s family members, close associates, designees, or entities owned or controlled by a Government Official may present the same risk and must be treated the same as requests or benefits involving a Government Official.

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- E. A “third party” is an individual or entity that the USOPC has a current or prospective business relationship with and includes both commercial relationships, e.g. contractors and vendors, and international relationships, e.g., National Governing Bodies, International Federations, National Organizing Committees, the International Olympic Committee, and the International Paralympic Committee.

2. Prohibited Conduct

The USOPC does not tolerate bribery or corruption in any form. Covered Individuals must never offer or accept a bribe of any kind. Covered Individuals must also not engage in corruption or engage in any dealings that someone could perceive as corrupt.

Covered Individuals must abide by all applicable anti-bribery and anti-corruption laws in the United States and in any country in which the USOPC is conducting business, as well as the USOPC’s rules relating to government officials in its [Gifts and Entertainment Policy](#).

All third parties of the USOPC are also prohibited from engaging in bribery or any other corrupt dealings in any form on behalf of the USOPC.

3. USOPC Anti-Bribery Compliance Program

The USOPC will maintain a risk-based anti-bribery and anti-corruption compliance program that is reasonably designed to prevent, detect, and respond to bribery and corruption risks in the jurisdictions and activities in which the USOPC operates.

The program will include: (a) periodic risk assessments, including risks related to international operations, government interactions, third parties, procurement, grants, donations, sponsorships, travel, meals, entertainment, and gifts; (b) risk-based training and communications for Covered Individuals; (c) risk-based due diligence and oversight of third parties; (d) financial and accounting controls designed to ensure accurate books and records and to prevent improper payments; (e) confidential reporting channels and non-retaliation protections; and (f) periodic monitoring, testing, and review of this policy and related controls.

The Chief Ethics and Compliance Officer will oversee implementation of this policy and will provide periodic reporting regarding material anti-bribery and anti-corruption risks, allegations, and program effectiveness to the Ethics Committee.

4. Use of Third Parties

Before retaining, renewing, or materially expanding a third-party relationship, the USOPC will conduct risk-based due diligence proportionate to the nature of the services and the risk presented. Heightened due diligence is required where risk factors are present, including but not limited to: (a) operations in or connections to high-risk jurisdictions; (b) expected interaction with government officials or public international organizations; (c) lobbying, licensing, permits, customs, immigration, tax, security, or similar government-facing activities; (d) unusual compensation terms, requests for cash, success fees, or payments to offshore or unrelated accounts; (e) referrals by a government official; (f) inadequate qualifications, opaque ownership, adverse reputation, or prior misconduct; or (g) use of subcontractors or other intermediaries.

Covered Individuals must involve the Ethics team before retaining or paying any third party that presents elevated bribery or corruption risk.

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5. Considerations for Delegation Events

Sometimes, delegates from the U.S. Government attend Delegation events for diplomatic or other governmental purposes, and, at times, the USOPC must facilitate their attendance—for example, by distributing tickets through an OCOG's International Dignitary Program. Outside of these types of official ticketing programs, to avoid the appearance of impropriety, Covered Individuals must not provide government officials (or their associates and family members) special or free access to events that otherwise require paid tickets or limit entry in some way. Outside of such official programs, all government officials must pay for tickets or access like any other member of the public, at no less than face value; and this purchase can be made through purchasing agreements between the USOPC and the U.S. Government. If a Covered Individual has any questions about whether to grant a government official's request for tickets or access, they should contact the Government Relations Team and either the Chief Ethics and Compliance Officer or the Ethics Director.

6. International Relations

Some Covered Individuals, NGB staff and volunteers, and, in certain cases, third parties acting on the USOPC's behalf, interact with the international community, including the International Olympic Committee (IOC), the International Paralympic Committee (IPC), International Sport Federations (IFs), National Olympic Committees (NOCs), and athlete commissions. These interactions include but are not limited to negotiating business terms; interactions with Games hosts; bidding for and hosting international events, meetings, and congresses; serving on international commissions; and attending international meetings or events.

All persons listed above and those acting on the USOPC's behalf must follow USOPC rules and the rules of the relevant international entity relating to gifts and the exchange of sensitive, proprietary information and must also avoid even the appearance of impropriety. It is important to note, in many instances, that the gifting threshold for an international entity is even more stringent than USOPC policy. For instance, Article 4 of the IOC's Code of Ethics limits IOC members and third parties to receiving or accepting only tokens of a nominal value, *e.g.*, pen, pin, to avoid perceptions of partiality or lack of integrity.

The USOPC is also responsible for entities organizing the Olympic and Paralympic Games in the United States, as well as those bidding for a future Games, and persons acting on those entities' behalf. Host and bid entities have defined rules of conduct that reflect the requirements of the IOC, the IPC, and the recommendations outlined in Congress's 1999 Report of the Special Bid Oversight Commission, commonly referred to as the Mitchell Report. More specifically, the USOPC prohibits a United States bid or organizing committee from participating in any process that assists IOC or IPC members, their designees, or other international organizations. A United States organizing committee is also prohibited from engaging in such conduct for two years after the organizing committee has ceased to operate as the host city of the Olympic and Paralympic Games.

7. Recognizing Bribery and Corruption Risk

It is important that Covered Individuals know how to recognize situations that are a higher risk for bribery and corruption. This section includes some examples of where Covered Individuals may be exposed to bribery or corruption, but it is not comprehensive. Covered Individuals must recognize and reject bribery and corruption in all forms. If a Covered Individual is ever unsure of whether they should engage in a certain transaction, they should contact the Chief Ethics and Compliance Officer or the Ethics Director.

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A. Direct Bribery and Corruption Risk

i. Contact with government officials

- a. A Covered Individual attempts to solicit a government official's support for a USOPC initiative by promising that government official event tickets at an Olympic or Paralympic Games. It does not matter whether the government official accepts the tickets; the attempt alone constitutes a violation of law.

ii. Contact with current or prospective business partners

- a. A Covered Individual is offered cash, entertainment, or a gift by a vendor to influence a contracting decision so that the vendor will receive the contract.

iii. Contact with athletes and those affiliated with them

- a. A Covered Individual is offered a "sweetheart deal" on a luxury vacation by an athlete's parent in exchange for providing an advantage to that athlete.

iv. Contact with the officials in connection with a host bid for the Olympic & Paralympic Games

- a. An individual with voting rights for a host bid solicits benefits for themselves and family members in exchange for supporting the USOPC's preferred host city in a vote.

B. Third Party Bribery and Corruption Risk

Situations involving third parties also present a bribery and corruption risk. Third parties may offer bribes or engage in corruption while acting on behalf of the USOPC, which can expose the USOPC to legal liability.

Oftentimes, bribery and corruption concerns involving a third party will not be obvious, so it is important to be cautious when working with a third party. When you have interactions with a third party (either an individual or a business entity), ask yourself the following questions:

i. Who is the third party?

It is important to know the third parties you are interacting with on behalf of the USOPC and the nature of their business. Key indicators to assess the risk associated with working with a third party include the third party's qualifications to perform the service for which it was retained, the third party's associations, the third party's business reputation, and the third party's relationships with government officials. If any of these factors raises red flags, consider why you are doing business with the third party and the risk of corruption related to the relationship.

ii. Why is this payment necessary?

As a Covered Individual, you should understand the business rationale for using a third party, including what specific services are being performed and why they are being performed. You should also consider the payment and if the value paid is actually commensurate with the work being performed or the services provided. If you cannot answer why a third party's involvement is necessary or are paying a rate that is not consistent with market prices, the transaction may be indicative of corruption.

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Covered Individuals who encounter a situation in which they feel uncomfortable in their interactions with a third party or suspect that a USOPC relationship with a third party is not legitimate should contact the Ethics team. The Ethics team can provide guidance on situations the Covered Individual is unsure about.

8. Facilitation Payments

Some anti-bribery and anti-corruption laws, such as the FCPA, do offer limited exceptions for “facilitation payments.” A facilitation payment is a payment to a foreign official, political party, or party official for “routine governmental action,” such as processing papers or issuing permits to expedite performance of non-discretionary duties. In other words, a facilitation payment is meant to speed up a process that a government official is otherwise bound to perform as part of their job or duties, influencing only the *timing* of an action, not the *outcome* of an action.

The difference between a bribe and a facilitation payment can be very difficult to distinguish, both legally and ethically. To ensure compliance with all applicable laws and reduce the reputational risk to the USOPC that can be caused by even the mere appearance of impropriety, the USOPC prohibits Covered Individuals from making facilitation payments.

The only exception is where a Covered Individual reasonably believes that failure to make the payment would create an imminent threat to health, safety, or liberty. In that circumstance, the Covered Individual must: (a) make only the minimum payment necessary to remove the immediate threat; (b) report the payment to the Chief Ethics and Compliance Officer or Ethics Director as soon as practicable, and in no event later than 24 hours after the payment is made; and (c) ensure that the payment is accurately and completely recorded in the USOPC’s books and records. No business need, delay, inconvenience, cost, or pressure to meet a deadline constitutes an emergency or permits a facilitation payment.

9. Books and Records

All USOPC transactions must be accurately, completely, and timely recorded in reasonable detail in the USOPC’s books and records. No Covered Individual may: (a) create or maintain an undisclosed or unrecorded fund, account, or asset; (b) submit or approve false, misleading, incomplete, or artificial invoices, receipts, expense reports, or other supporting documentation in order to circumvent this policy; (c) mischaracterize the purpose of any payment, reimbursement, gift, travel, meal, hospitality, donation, grant, sponsorship, or other thing of value; (d) make or request payment in cash except as expressly permitted by applicable finance procedures and supported by complete documentation; (e) split transactions or otherwise structure payments to avoid approval thresholds, due diligence requirements, or review controls; or (f) make payment to a person or account other than the contracting party without documented business justification and appropriate approval.

All payments to third parties must be supported by a written agreement, a legitimate business justification, and documentation demonstrating that the amount paid is reasonable and proportionate to the services actually rendered.

10. Violations

If the Ethics team or the Ethics and Compliance Committee has cause to believe a Covered Individual has engaged in bribery or corruption, the matter may be referred to law enforcement and investigated. If there is a determination that a Covered Individual engaged in unethical and / or illegal conduct following any internal and / or external investigation, the USOPC will take appropriate disciplinary action including termination of employment.

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11. Speak Up Policy and Reporting Violations

The [USOPC Code of Conduct](#) requires USOPC Team Members to report violations of USOPC policies, including this policy; the process to report violations is outlined in the [Speak Up Policy](#). Individuals, including USOPC Team Members, who identify a bribery or corruption concern must immediately report the concern to the USOPC’s Chief Ethics and Compliance Officer in addition to reporting the matter through the [USOPC Integrity Portal](#) or calling the USOPC’s Integrity Hotline at 1-877-404-9935.

By reporting, an individual need not, and should not, investigate the matter. The reporter should report only the facts that they know and allow the Ethics team and/or the Ethics and Compliance Committee to investigate the matter.

The USOPC has zero tolerance for retaliation against people who make good faith reports of potential ethical, policy, or legal violations, or of any other concerns of misconduct, or who cooperate with investigations of those reports. That means no USOPC staff, board or committee member, or volunteer may threaten, harass, discriminate against, or take any negative employment related action (e.g., discharge, demotion, suspension, negative review) on the basis of the individual reporting a concern, including those related to bribery and corruption.

12. Resources

If you have questions about this policy, please contact the Chief Ethics and Compliance Officer or the Ethics Director.

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 Ethics Director: Michael McGinnis (mike.mcginnis@usopc.org)

Policy History

Publication Type	Policy Approver	Enabling Action	Publication Date	Next Scheduled Review	Revision Summary
Initial Publication	Board of Directors	Board Vote, December 16, 2021	December 16, 2021	N/A	N/A – original publication
Revision	Board of Directors	Board Vote, December 7, 2023	December 7, 2023	December 2024	Added policy for Delegation Event ticketing and access to government officials; clarified relevant definitions
Revision	Board of Directors	Board Vote, April XX, 2026	April XX, 2026		Added information on Anti-Bribery Compliance Program, definition of government official, use of third parties and enhanced due diligence, books and records requirements, and use of third parties.