

# US Olympic & Paralympic Committee Policy



**Procedure Name:** USOPC Ethics Policy

**Date of Issuance:** 3/14/2024

**Policy Owner:** Chief Ethics and Compliance Officer

**Applies to:** USOPC Staff, Volunteers, Board of Directors, Committees, and NGBs

## **Purpose:**

To outline how the USOPC and its Ethics & Compliance Committee support and promote a culture of ethical conduct within the USOPC and NGBs, and by extension throughout the broader Olympic and Paralympic movements.

## **Policy Statement:**

The promotion of an ethical workplace free from misconduct allows the USOPC to focus on its mission to empower Team USA athletes to achieve sustained competitive excellence and well-being. To that end, the Ethics team provides training, and develops and implements policies and procedures to equip USOPC team members with guidance and resources to successfully navigate ethics and code of conduct-related issues.

## **I. USOPC Ethics Program**

The Chief Ethics & Compliance Officer and the Ethics Director report functionally to the Ethics and Compliance Committee in connection with Ethics matters. The Ethics team is responsible for the development and operational integration of this Policy, the USOPC Ethics Procedure, the Code of Conduct, Conflict of Interest Policy, Outside Work Policy, Speak Up Policy, the Gifts and Entertainment Policy, the Sports Betting Policy, the Damages for Retaliation Procedure, and the Charitable Contributions Policy. The Ethics team also provides advice to USOPC staff and NGBs on an ad hoc basis; handles, and where necessary investigates, ethics complaints received through the USOPC's Integrity Portal; and coordinates the annual conflict of interest disclosure process. Additionally, the Ethics team provides ongoing training related to gifts and entertainment and conflicts of interest, among other topics.

## **II. Ethics and Compliance Committee**

The Ethics and Compliance Committee meets on a regular basis throughout the year and on an as-needed basis as time-sensitive matters arise. The USOPC's Chief Ethics & Compliance Officer and the USOPC's Ethics Director support the Ethics and Compliance Committee and attend all Ethics and Compliance Committee meetings. The Ethics and Compliance Committee's responsibilities are outlined in Section 5.8.3 of the USOPC Bylaws. Consistent with these responsibilities, the Ethics and Compliance Committee reviews the Ethics team's recommendations and resolutions related to conflict of interest disclosures for significant conflicts and for USOPC team members at the director level and above, as well as certain conflict disclosures related to Internally Managed Sports as outlined in the Ethics Procedure. [add link] The Ethics and Compliance Committee may also be asked to approve charitable contributions made on the USOPC's behalf to any non-profit entity associated with a USOPC Board or Committee member, the USOPC CEO, or any of their spouses or family members.

Additionally, the Ethics and Compliance Committee may review the handling of ethics-related complaints, against USOPC Board and Committee members, and certain USOPC staff, and has the authority to conduct Ethics investigations at the Board's request or at the request of the Chief Ethics & Compliance Officer. The processes

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for reviewing conflicts of interest, conducting investigations, and reviewing charitable contributions are outlined in the USOPC's Ethics Procedure.

### **Revision History**

<b>Publication Type</b>	<b>Procedure Approver</b>	<b>Enabling Action</b>	<b>Publication Date</b>	<b>Next Scheduled Review</b>	<b>Revision Summary</b>
Initial Publication	Ethics and Compliance Committee	March 10, 2021, Board Meeting	March 23, 2021	March 2022	N/A – original publication
Revision	Board of Directors	March 14, 2024, Board Meeting	March 14, 2024	March 2025	Updated Ethics and Compliance Committee's responsibilities for reviewing certain conflict disclosures and added reference to review of charitable contributions. Also included references to the Sports Betting Policy, Damages for Retaliation Procedure, and Charitable Contribution Policy.