

US Olympic & Paralympic Committee Policy



Policy Name: Conflict of Interest Policy

Date of Issuance: September 25, 2025

Policy Owner: Chief Ethics and Compliance Officer

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

Purpose:

To support a culture of strong ethical conduct, protect the integrity of the United States Olympic & Paralympic Committee (USOPC), and ensure that decisions made by individuals affiliated with the USOPC are made in the USOPC's best interests, the Conflict of Interest Policy defines conflicts of interest and the process by which conflicts of interest are disclosed, reviewed, and ultimately managed.

Policy Statement:

The USOPC believes in sustaining a culture of strong governance, ethics, and compliance throughout the U.S. Olympic and Paralympic community. To support this culture, the USOPC requires that all Covered Individuals recognize and avoid any activity that constitutes or might reasonably appear to constitute a conflict of interest. For the purposes of this policy, the term "Covered Individual" includes all USOPC Team Members (employees and temporary employees engaged through a staffing service), board members, officers, committee members, task force members, hearing panel members, and other volunteers with substantial decision-making authority.¹

1. Definitions

A conflict of interest exists when a Covered Individual's activities, interests, or relationships interfere with, influence, or may be perceived to interfere with or influence their ability to be impartial and make decisions in the best interest of the USOPC. The interests of a Covered Individual's relatives and close associates must also be considered when evaluating whether a conflict of interest exists. Relatives and close associates (RCAs) include, for example, spouses/domestic partners, children, siblings, parents, in-laws, close friends, and business partners.

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 a Covered Individual has a relationship with a person or organization that may influence their decision making in their role with the USOPC or otherwise interfere or compete with the Covered Individual's duty of loyalty to the USOPC. A Covered Individual has an actual conflict of interest when the Covered Individual could gain personally from organizational decisions.

B. Potential Conflict of Interest

A potential conflict of interest exists when circumstances indicate that a future event or decision could create an actual conflict of interest for a Covered Individual. This includes situations where a Covered Individual has a

¹ Substantial decision-making authority means decisions that may have an organization-wide effect or that may significantly impact athletes.

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relationship with a person or organization that could become subject to USOPC decisions, or where changing circumstances could create competing loyalties or opportunities for personal gain. For example, a Covered Individual who has a relationship with an entity being considered for a vendor contract but outside of the Covered Individual's control has a potential conflict that would become actual if the vendor relationship is established.

C. Perceived Conflict of Interest

A perceived conflict of interest exists when circumstances are such that a reasonable, informed third party could question a Covered Individual's impartiality, independence, or loyalty to the USOPC, regardless of whether an actual conflict of interest exists. This includes situations involving family relationships, *de minimis* financial interests, professional associations, community involvement, or prior employment history that could create the appearance of divided loyalties or compromised judgment. A perceived conflict may also exist when a Covered Individual has properly disclosed an actual conflict and recused themselves from decision-making but takes actions that suggest continued involvement in the matter, such as remaining present during discussions or communicating privately about the decision with other participants. Perceived conflicts require appropriate management because they can damage organizational reputation and stakeholder confidence even when no actual impropriety exists.

2. Recognizing Conflicts of Interest

Conflicts of interest often arise in the following key areas.

A. Outside employment or other activities

- i. A Covered Individual or their RCA is employed by, provides services for, or receives payments or other financial or non-financial benefits from a NGB, vendor, or another partner with whom the Team Member actively works with in their role with the USOPC.

B. Financial interests

- i. A Covered Individual or their RCA has a substantial investment or other financial interest in a business partner, and the Covered Individual has a working relationship with that business partner in their role at the USOPC.

C. Personal relationships at work

- i. A Covered Individual supervises or is supervised by an RCA.
- ii. A Covered Individual hires, directly or indirectly, an RCA in a role reporting to them.
- iii. A Covered Individual contracts, directly or indirectly, an RCA as a supplier to the USOPC.
- iv. A Covered Individual is involved in a selection decision that involves or impacts an athlete with whom the Team Member or an RCA has a relationship.

D. Corporate opportunities

- i. A Covered Individual takes advantage of a business opportunity that the USOPC may also have an interest in.

While this list captures some common areas where conflicts of interest arise, it is not comprehensive. Team Members must recognize that all situations where their personal interests intersect with the USOPC's interests

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can lead to conflicts of interest. If a Covered Individual is unsure if a specific activity, interest, or relationship constitutes a conflict of interest, the Covered Individual should reach out to a member of the Ethics team who can help determine if a conflict exists.

3. Disclosure

A. Annual Disclosures

The USOPC requires that all Covered Individuals complete an annual disclosure and self-identify any actual, potential, or perceived conflicts of interest.

All new USOPC employees are required to complete a conflict of interest disclosure upon hiring, and will also be included in the next annual cycle.

All annual disclosures will be distributed by the USOPC Ethics and Compliance team using the disclosure management system.

B. Ongoing Disclosure

In addition to the annual disclosure, all Covered Individuals have an ongoing obligation to disclose any change in their personal activities, interests, or relationships that creates a potential new conflict of interest—whether actual, apparent, or perceived—or changes the nature of a previously disclosed conflict of interest.

Covered Individuals can complete an ongoing disclosure through the disclosure management system at any time by amending their annual disclosure form.

C. Election and Service-Related Disclosures

For Covered Individuals who have disclosure requirements related to vetting before standing for Board or Committee election or selection to serve on a USOPC task force or in another decision-making panel or role, disclosure requirements will be fulfilled on a rolling basis. The USOPC committee or department (e.g., the Nominating and Governance Committee or Dispute Resolution Unit) overseeing the election/selection of these individuals should consult the Ethics team to determine the appropriate disclosure requirements.

Other volunteers with substantial decision-making authority on behalf of the USOPC will be made aware of their obligations under this policy in their volunteer agreement. If the volunteer has a conflict requiring disclosure, they will be directed to contact the Ethics team to complete a disclosure. The disclosure process for athlete volunteers who sit on an Internally Managed Sport selection committee is outlined in the USOPC's Ethics Procedure.

D. Additional Board and Committee Member Disclosure Requirements

To avoid misperceptions about improper influences or relationships between board and committee members, board and committee members must disclose contributions made to, and business relationships with, any charitable or commercial organizations in which another Board or committee member plays a management or governance role. 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 votes. Recusal means the board or committee member must leave the room or the teleconference

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entirely and return only when the discussion or vote on the agenda item is completed. The minutes should reflect each disclosure and recusal.

4. Review

The Ethics team collects and reviews conflict of interest disclosures, documents any actual or potential conflicts of interest, and determines any actions required to manage the conflict of interest. Any complex or sensitive disclosures may also be escalated to the USOPC's Ethics and Compliance Committee for further review and input.

All actual or potential conflicts disclosed by USOPC board, committee, and senior staff members' (Director-level and above) will be provided to the Ethics and Compliance Committee so its members have an opportunity for review. Additionally, the Chief Ethics and Compliance Officer will provide to the Committee any additional significant conflicts disclosed by individuals outside of those categories.

5. Managing Conflicts of Interest

The disclosure of an actual or potential conflict of interest will not necessarily prohibit involvement in the disclosed activity or with the USOPC. Rather, each disclosure will be reviewed individually, and actions may be recommended to protect the individual, the USOPC, and the integrity of the decisions made by those individuals and the USOPC from actual, potential, and perceived conflicts of interests. These actions may include limitation of involvement, separation from certain USOPC activities, or requests to cease the activity in question. All follow-up will be discussed with the individual board member, employee, or volunteer directly. If necessary, the Ethics team may discuss with individual managers.

6. Violations

If the Ethics team or the Ethics and Compliance Committee has cause to believe a Covered Individual has failed to disclose an actual or potential conflict of interest or is not complying with the measures imposed for a previously disclosed conflict of interest, the matter will be investigated. While any violation is under investigation, the Covered Individual will be precluded from engaging in further decisions related to the conflict that is the subject of the investigation.

Following the investigation, if the Ethics team or the Ethics and Compliance Committee determines the Covered Individual has failed to disclose the actual or potential conflict of interest, the Ethics and Compliance Committee will take appropriate disciplinary and corrective action. The Ethics and Compliance Committee's decision will be final and is not appealable.

7. Speak Up Policy and Reporting Violations

The [USOPC Code of Conduct](#) requires Covered Individuals to report violations of USOPC policies, including this policy, and the process to report violations is outlined in the [Speak Up Policy](#). Individuals wishing to report a conflict of interest concern may also report the matter through the USOPC Integrity Hotline at 1-877-404-9935 or through the USOPC [Integrity Portal](#).

By reporting, an individual does not need to, and should not, investigate the matter or feel that they must provide a full narrative. Instead, 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 who cooperate with investigations of those reports. That means no USOPC staff,

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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. Additional details about the USOPC's anti-retaliation measures can be found in the Speak Up Policy.

8. Resources

Any individual with questions about this policy, any activity which they are unsure about disclosing, or any other matters related to conflicts of interest is encouraged to contact the Senior Director for Compliance Investigations and Ethics, the Chief Ethics and Compliance Officer, or report the matter using the [USOPC Integrity Portal](#).

Senior Director for Integrity & Investigations: Michael McGinnis (mike.mcginnis@usopc.org)

Chief Ethics and Compliance Officer: Holly Shick (holly.shick@usopc.org)

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Revision History (from December 16, 2021)

Publication Type	Policy Approver	Enabling Action	Publication Date	Next Scheduled Review	Revision Summary
Policy Update	Board of Directors	Board Vote; December 16, 2021	December 16, 2021	N/A	Initial publication of revised policy that aligns with NGB Compliance Standards requirements for conflicts of interest policies, and guidance for board and committee contributions to and business relationships with fellow board and committee members' charitable or commercial organizations; also included reference to USOPC Integrity Portal
Policy Update	Board of Directors	Board Vote; June 22, 2022	June 22, 2022	June 2023	Revised to update disclosure language to reflect new automated process
Policy Update	Board of Directors	Board Vote; December XX, 2023	December XX, 2023	December 2024	Revised to update applicability to certain volunteers, disclosure requirements for election and selection candidates, and escalation to the Ethics and Compliance Committee
Policy Update	Board of Directors	Board Vote; September 25, 2025	October 7, 2025	December 2026	Revised to update definitions of actual, potential, and perceived conflicts of interest. Additional stylistic changes.