



CONFLICT OF INTEREST POLICY

Policy Owner: USA Weightlifting CEO

Effective Date: August 25, 2025

- 1. Purpose.** USA Weightlifting is committed to sustaining an ethical organization 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 Weightlifting honestly and prudently, and to exercise their best care, skill, and judgment for the sole benefit of USA Weightlifting. Those persons will exercise the utmost good faith in all transactions involved in their duties, and they will not use their positions with USA Weightlifting or knowledge gained therefrom for their personal benefit. The interests of the organization must be the first priority in all decisions and actions. USA Weightlifting 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. 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 USA Weightlifting.

- 2. Applicability of Policy.** This Conflict of Interest Policy is applicable to all USA Weightlifting Affiliated Individuals. “**Affiliated Individuals**” include, but are not limited to, USA Weightlifting Board members, officers, committee members, task force members, hearing panel members, employees, and volunteers. Where reasonable, USA Weightlifting contractors may be required to comply with this policy in their contracts.

- 3. Definitions.**

- 3.1.** A “**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 USA Weightlifting or undermine the interests of USA Weightlifting. 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.

- 3.2.** A “**Conflict**” can exist in the context of athlete or team selection when an Affiliated Individual participates in a selection decision that involves or impacts themselves or an athlete or coach 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. As defined below, a conflict of interest may be actual, potential, or perceived.

3.3. 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 USA Weightlifting.

3.4. 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 USA Weightlifting. By contrast, if the vendor relationship is established, the Affiliated Individual would have an actual conflict of interest related to this vendor.

3.5. 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 reasonably 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.

4. Areas in Which Conflicts May Arise.

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

4.1.1. Persons or entities supplying goods and services to USA Weightlifting;

4.1.2. Persons or entities leasing property or equipment to USA Weightlifting;

4.1.3. Persons or entities with whom USA Weightlifting is dealing or planning to deal in connection with the gift, purchase, or sale of real estate, securities, or other property;

4.1.4. Competing or affinity organizations;

4.1.5. Donors and others supporting USA Weightlifting;

4.1.6. Agencies, organizations, and associations which affect the operations of USA Weightlifting; or

4.1.7. RCAs and other employees of USA Weightlifting.

4.2. 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, as described in more detail below.

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

4.3.1. An Affiliated Individual has personal relationships with other Affiliated Individuals who they regularly work alongside or who their work affects.

EXAMPLE: Two USA Weightlifting board members who are serving at the same time are married.

EXAMPLE: A USA Weightlifting board member is the parent of a current national team athlete.

4.3.2. An 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 USA Weightlifting.

EXAMPLE: A USA Weightlifting board member owns a 70% interest in a company seeking to enter into a contract with USA Weightlifting to provide consulting services.

4.3.3. An Affiliated Individual or an RCA owns a business, maintains a second job, or provides goods or services under a provider, contractor, or consulting agreement, whereby the outside business provides goods or services to USA Weightlifting, the USOPC, or any other NGB.

EXAMPLE: USA Weightlifting is contemplating entering into an agreement with an HR consulting company owned by a USA Weightlifting employee's husband.

4.3.4. An 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 USA Weightlifting.

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

4.3.5. An Affiliated Individual uses USA Weightlifting's time, personnel, equipment, supplies, or goodwill for anything other than USA Weightlifting-approved activities, programs, and purposes.

EXAMPLE: A USA Weightlifting employee uses a USA Weightlifting vehicle for a personal road trip.

- 4.3.6.** An Affiliated Individual solicits gifts or gratuities using their USA Weightlifting role or accepts personal gifts, loans, gratuities, or discounts from third parties, including situations that may or may not constitute a violation of USA Weightlifting's Gifts & Entertainment Policy. No personal gift of money should be accepted in connection with an Affiliated Individual's role with USA Weightlifting.

EXAMPLE: A USA Weightlifting employee using her position at USA Weightlifting to obtain box seats to a sporting event from a vendor for personal use.

EXAMPLE: Accepting tickets to a football game worth \$250 from a business seeking to obtain a contract to provide landscaping services for USA Weightlifting headquarters.

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

- 4.3.7.** An Affiliated Individual or an RCA acts as an agent, representative, or consultant to a business whose interests may conflict with the interests of USA Weightlifting.

EXAMPLE: A USA Weightlifting board member agrees to promote another NGB in negotiations with potential sponsors or licensees.

- 4.3.8.** An Affiliated Individual or an RCA has a business relationship with a sponsor, supplier, licensee, or vendor of USA Weightlifting.

EXAMPLE: A USA Weightlifting employee's spouse provides legal services to a USA Weightlifting sponsor.

- 4.3.9.** An Affiliated Individual awards USA Weightlifting business to, or provides favorable treatment to, a business owned or controlled by a volunteer or an RCA.

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

- 4.3.10.** An Affiliated Individual approves selection procedures or participates and/or votes within a discretionary selection committee of USA Weightlifting 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 the Affiliated Individual might benefit directly or indirectly from the selection method.

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

4.3.11. An 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 USA Weightlifting or undermine the interests of USA Weightlifting.

EXAMPLE: A USA Weightlifting board member has a significant client who owns or operates a facility being considered as the host of a USA Weightlifting 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 USA Weightlifting and participates in the allocation decision.

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.

Disclosure of a conflict or potential conflict of interest does not necessarily prohibit involvement in the disclosed activity or with USA Weightlifting. 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 Weightlifting and the Affiliated Individual to implement appropriate mitigating measures upon full disclosure of all relevant facts and circumstances. However, it is USA Weightlifting'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 Disclosure Statements. All Affiliated Individuals must comply with the Conflicts of Interest Policy and proactively disclose actual or potential conflicts of interest as they arise.

6.1. In addition, all members of the following groups of Affiliated Individuals must, on at least a biannual (every two years) basis, sign and submit to the Ethics Committee and USA Weightlifting's compliance staff person, as designated by the CEO, or the compliance staff person's designee ("Compliance Manager") a standardized disclosure form to disclose any actual or potential conflicts of interest:

- USA Weightlifting employees
- Officers
- Committee members
- Volunteers and contractors with substantial decision-making authority

6.2. Board members are required to complete the disclosure form prior to their initial election, and annually thereafter.

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

6.4. Any new USA Weightlifting employee will submit a conflict of interest disclosure statement within 14 days of his or her hiring by USA Weightlifting to fulfill the biannual disclosure requirement. Any other new Affiliated Individuals who are required to submit a biannual 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 biannual disclosure requirement. In no event will an Affiliated Individual participate in any decisions to commit USA Weightlifting to a proposed transaction or in athlete or team selection procedures prior to submission of his or her conflict of interest disclosure statement.

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

6.6. USA Weightlifting will maintain copies of all disclosures submitted in accordance with its document retention policies and procedures.

7. Periodic Updates and Real Time Disclosure. In addition to the required biannual disclosures, each employee, board member or officer, committee member, and volunteer or contractor with substantial decision-making authority will submit to the Ethics Committee an updated disclosure describing any new potential conflicts of interest or material changes to a previously disclosed conflict of interest as they arise. USA Weightlifting will maintain copies of all periodic statements or updates submitted in accordance with its document retention policies and procedures.

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.

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

8.1. Review of Disclosures. The Ethics Committee 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. Designated USA Weightlifting employees and/or contractors assist the Ethics Committee with the collection and documentation of this process.

8.2. Conflicts will be addressed as follows:

8.2.1. The Ethics Committee 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.

8.2.2. The Ethics Committee will determine whether an actual or apparent conflict of interest exists.

8.2.3. If the 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 Weightlifting must take or not take in order to avoid the conflict.

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

8.2.5. All direction for managing conflicts will be discussed with the Affiliated Individual directly and will be documented in writing. If a material conflict is identified (whether actual or potential) for the CEO, board member, or Designated Committee (as defined by the USOPC Bylaws) member, the Ethics Committee must communicate, in writing, its direction on conflict management to the individual, in addition to any verbal direction.

8.3. With Respect to Proposed USA Weightlifting Business Transactions or Arrangement. In the event a potential conflict of interest exists with respect to a proposed business 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:

8.3.1. The interested person shall identify the potential conflict and notify the Compliance Manager.

8.3.2. 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.

8.3.3. The interested person will then recuse themselves from any and all discussion and approval (if applicable) of the conflict of interest.

8.3.4. The Ethics Committee will determine whether an actual or apparent conflict of interest exists. For transactions, the Ethics Committee may consider whether a competitive bid or competitive evaluation exists.

8.3.5. 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 Weightlifting must take or not take in order to avoid the conflict.

8.3.6. If the Ethics Committee determines that the transaction is a “related party transaction,” as discussed in the next section, it shall notify the Board of the same.

8.4. With Respect to Related Party Transactions. The following more particularized disclosure requirements and procedures apply in the context of related party transactions.

- 8.4.1.** “Related party” means (i) any director, officer or key person of USA Weightlifting or any affiliate of USA Weightlifting; (ii) any relative of any individual described in clause (i) of this subparagraph; or (iii) any entity in which any individual described in clauses (i) and (ii) of this subparagraph has a thirty-five percent or greater ownership or beneficial interest or, in the case of a partnership or professional corporation, a direct or indirect ownership interest in excess of five percent.
- 8.4.2.** “Related party transaction” means any transaction, agreement or any other arrangement in which a related party has a financial interest and in which USA Weightlifting or any affiliate of USA Weightlifting is a participant, except that a transaction shall not be a related party transaction if: (i) the transaction or the related party’s financial interest in the transaction is de minimis, (ii) the transaction would not customarily be reviewed by the board or boards of similar organizations in the ordinary course of business and is available to others on the same or similar terms, or (iii) the transaction constitutes a benefit provided to a related party solely as a member of a class of the beneficiaries that USA Weightlifting intends to benefit as part of the accomplishment of its mission which benefit is available to all similarly situated members of the same class on the same terms.
- 8.4.3.** “Key person” means any person, other than a director or officer, whether or not an employee of USA Weightlifting, who (i) has responsibilities, or exercises powers or influence over USA Weightlifting as a whole similar to the responsibilities, powers, or influence of directors and officers; (ii) manages USA Weightlifting, or a segment of USA Weightlifting that represents a substantial portion of the activities, assets, income or expenses of USA Weightlifting; or (iii) alone or with others controls or determines a substantial portion of USA Weightlifting’s capital expenditures or operating budget.
- 8.4.4.** USA Weightlifting not shall enter into any related party transaction unless the transaction is determined by the Board, to be fair, reasonable and in USA Weightlifting’s best interest at the time of such determination. Any director, officer or key person who has an interest in a related party transaction shall disclose in good faith to the Board, and the Ethics Committee, the material facts concerning such interest.
- 8.4.5.** With respect to any related party transaction involving USA Weightlifting and in which a related party has a substantial financial interest, the Board shall:
- 8.4.5.1.** Prior to entering into the transaction, consider alternative transactions to the extent available;
 - 8.4.5.2.** Approve the transaction by not less than a majority vote of the directors present at the meeting; and
 - 8.4.5.3.** Contemporaneously document in writing the basis for the Board’s approval, including its consideration of any alternative transactions.

8.4.6. Any related party transaction made in violation of the requirements in this section 8.4 shall be voidable by decision of the Board, unless:

8.4.6.1. The material facts as to the key person's relationship or interest and as to the contract or transaction are disclosed or are known to the Board, and the Board in good faith authorizes the contract or transaction by the affirmative votes of a majority of the disinterested directors, even though the disinterested directors be less than a quorum; or

8.4.6.2. The contract or transaction is fair as to USA Weightlifting as of the time it is authorized, approved or ratified, by the Board.

8.5. With Respect to Drafting Selection Procedures and Athlete/Team Discretionary Selection.

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.

Any Affiliated Individual involved in the drafting of selection procedures, including the athlete representative, or on a discretionary selection committee, who has a potential conflict of interest must disclose it to the Ethics Committee for review. The following process will be followed:

8.5.1. The interested person may make a presentation to the Ethics Committee, which may be convened telephonically, regarding the potential conflict of interest.

8.5.2. The interested person will then recuse themselves from any and all discussion regarding the potential conflict of interest.

8.5.3. The Ethics Committee will determine whether an actual or apparent conflict of interest exists.

8.5.4. 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 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.

8.5.5. 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.

8.6. With Respect to Seating Hearing Panels. The following more particularized disclosure requirements and procedures apply in the context of seating internal USA Weightlifting 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.

8.6.1. 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 Ethics Committee will solicit and review potential panel members' disclosures (if any) and make a determination on whether they are a disinterested party for the matter under review.

8.6.2. Hearing panel appointments are subject to an objection from either the complaining party or responding party on the grounds of a conflict of interest, as further set out in the Complaint Resolution and Hearing Procedures.

8.6.3. For hearing panels appointed by an arbitration services provider, conflicts will be disclosed and panelists seated according to the arbitration services provider's procedures.

8.7. Additional Considerations. An interested person with an actual conflict of interest shall not be present at or participate in Board or committee deliberation or vote on the matter giving rise to such conflict, provided that nothing in this provision shall prohibit the Board or a committee from requesting that the interested person present information as background or answer questions at a committee or Board meeting prior to the commencement of deliberations or voting relating thereto. An interested person shall not attempt to influence improperly the deliberation or voting on the matter giving rise to a conflict.

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 Weightlifting Ethics Committee of such perceived conflict by emailing a report to designated Ethics Committee 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 USA Weightlifting's Ethics Committee by emailing a report to designated Ethics Committee email address.

All good faith reports of violations of this policy are protected under the provisions of the USA Weightlifting Whistleblower Policy. USA Weightlifting has zero tolerance for retaliation against an individual for filing a good faith report of a violation or potential violation. Consult the USA Weightlifting Whistleblower Policy for additional information.

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 Weightlifting that bear any relation whatsoever to the matter that is the subject of the conflict or potential conflict of interest.

11. USA Weightlifting Resources. USA Weightlifting's Compliance Manager, together with the Ethics Committee, is responsible for this policy and its enforcement and can be contacted with any questions about this policy at: Compliance@USAWeightlifting.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

Revision No.	Revision/ Approval Date	Effective Date	Revision Approver	Description of Revision
v.2	04/15/2025	08/25/2025	Board of Directors	This policy replaces the prior Conflict of Interest Policy and the former Statement of Principles and Conflict of Interest.