



# CODE OF CONDUCT POLICY

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NATIONAL OFFICE  
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## I. Introduction

USA Karate supports United States Karate and Para-Karate athletes in achieving sustained competitive excellence and to support and grow the sport of Karate in the United States while maintaining the well-being of our members. USA Karate accomplishes this mission through its commitment to:

- Honesty, integrity, and trustworthiness in all dealings.
- Respect for the rights, differences, and dignity of others.
- Accountability and transparency.
- Stewardship of the Olympic Movement.

The USA Karate has adopted this Code of Conduct to support these values and with the expectation that the people who work for, or on behalf of, USA Karate conduct themselves in a manner consistent with the USA Karate's mission and core values.

## II. Applicability

This Code of Conduct applies to all employees, independent contractors, members, volunteers, board members, officers, committees and member organizations of USA Karate (applicable individuals).

## III. Reporting Obligations

No code of conduct can address every situation, nor can it take the place of good judgment and/or integrity. USA Karate maintains an "open door" for anyone who has questions or concerns. USA Karate will support all efforts to comply with this Code of Conduct. If you need advice or assistance concerning the application of any aspect of these standards, consult your supervisor or manager, the Chief Executive Officer (CEO), the Ethics Officer, the Ethics Committee, or the Judicial Committee. You are expected to seek advice and clarification promptly when you are uncertain about proper actions or practices.

You should be alert and sensitive to situations that could result in unethical, illegal or improper actions. You have an obligation to report potential or actual violations of this Code of Conduct to your supervisor or manager, the CEO, the Ethics Officer, the Ethics Committee, the Judicial Committee or any other designated reporting authority identified by USA Karate.

USA Karate will provide an Ethics Hotline and Website for reporting Ethics violations, run by an independent service, to provide confidential reporting. These services will

support the ability to accept anonymous reports. The Ethics Officer will monitor and address any reports they receive.

The USA Karate Ethics Hotline number is 1-844-598-1865

The USA Karate Ethics Website is [www.USAKarateEthics.com](http://www.USAKarateEthics.com)

USA Karate Governance Documents <https://www.usankf.org/about-us/governance-documents>

Under no circumstances will an individual be subject to any disciplinary or retaliatory action for filing, in good faith, a report of a violation or potential violation of the Code of Conduct. However, filing known false or malicious reports will not be tolerated, and anyone filing such reports will be subject to appropriate disciplinary action. This policy is covered under the USA Karate Whistleblower and Protection Policy

- **Whistleblower Policy**

#### IV. Response and Resolution

Suspected violations reported to USA Karate will follow the USA Karate Complaint and Hearing Procedures.

- **Complaint and Hearing Procedures**

The Ethics Officer reviews the results of the investigation and works with the Ethics Committee to determine a hearing panel. The hearing panel will be free of conflicts of interest made up of disinterested parties including athlete representation. The respondent can request that a formal hearing be held. The hearing panel will adjudicate the complaint. Should the respondent disagree with the decision of the hearing panel they have the right to appeal the decision to the Judicial Committee.

#### V. Legal Compliance

USA Karate requires that all applicable individuals follow the Code of Conduct and abide by all applicable USA Karate policies and procedures; United States Olympic and Paralympic Committee (USOPC) policies and procedures; Olympic Movement Code on the Prevention of the Manipulation of Competitions; United States federal, state and local law as applicable, including the Ted Stevens Olympic and Amateur Sports Act, codified at 36 U.S.C. §§ 22501 – 22529; and foreign law as applicable. If members or employees encounter a conflict of law, such as a conflict between United States and foreign law, or have any questions

about the legality of any action, contact the Ethics Committee for further information and guidance. [ethics@usankf.org](mailto:ethics@usankf.org)

IPC Code of Ethics

<https://www.paralympic.org/sites/default/files/2024-04/IPC%20Code%20of%20Ethics.pdf>

## VI. Commitment to Integrity

USA Karate is committed to honesty and integrity as the cornerstone of its activities. In turn, USA Karate expects applicable individuals to conduct themselves in an ethical and legal manner as a representative of USA Karate. This requires that applicable individuals:

- Respect the rights of all individuals to fair treatment and equal opportunity, free from discrimination or harassment of any type, including, without limitation on the basis of race, color, religion, gender, gender identity, sexual orientation, age, national origin or otherwise.
- Know, understand and comply with all applicable laws, regulations and codes of conduct that apply to the business of USA Karate.
- Abide by all rules, regulations and policies established by USA Karate, USOPC, International Olympic Committee (IOC), World Karate Federation (WKF), PanAmerican Karate Federation (PKF), US Anti-doping Agency (USADA) and World Anti-doping Agency (WADA).
- Abide by the Olympic Movement Code on the Prevention of the Manipulation of Competitions
- Ensure that all USA Karate work and transactions are handled with honesty and recorded accurately.
- Protect information that belongs to USA Karate, our workers, volunteers, members and customers.
- Never use USA Karate, WKF, PKF or USOPC assets or information for personal gain.
- Recognize that even the appearance of misconduct or impropriety can be very damaging to the reputation of USA Karate and act accordingly.

Additionally, USA Karate finds sexual and physical abuse intolerable and in direct conflict with Olympic ideals. USA Karate is committed to ensuring that it and its

applicable individuals promote an environment free from such abuse; and such commitment extends not only to USA Karate's workplace, but also to the creation of safe sporting environments for athletes. To that end, USA Karate forbids any form of sexual or physical abuse, whether in the workplace or outside it, and including instances involving athletes. All applicable individuals have a duty to report any alleged sexual or physical abuse occurring in the workplace or at any USA Karate supported training or sport activity in accordance with USA Karate's Participant Safety Handbook or Minor Athlete and Officials Abuse Prevention Policies to the U.S. Center for SafeSport.

No individual who is an employee, contractor, or agent of USA Karate may assist a member or former member of USA Karate in obtaining a new job (excluding the routine transmission of administrative or personnel files) if the individual knows that the member or former member a) violated the policies or procedures of the U.S. Center for SafeSport related to sexual misconduct; and/or b) was convicted of a crime involving sexual misconduct with a minor in violation of applicable law or the policies and procedures of the U.S. Center for SafeSport.

#### VII. Ethics Program

USA Karate has established an Ethics Committee and has designated the Chairperson as the Ethics Officer who reports to the CEO or his/her designee. The Ethics Officer will monitor ethics reports and coordinate ethics education for USA Karate. The Ethics Officer works to ensure that the Ethics Committee is involved in ethics issues as appropriate.

#### VIII. Conflicts of Interest

USA Karate has instituted a Conflict of Interest Policy that requires any conflicts of interest, whether actual or apparent, be reported promptly to the Ethics Officer. A copy of the Conflict of Interest Policy may be found on USA Karate's website at Governance Documents. All applicable individuals are subject to the conflict of interest policy, including its mandatory reporting of conflicts. In addition, all USA Karate employees, volunteer staff, committee members and Board members are required to complete an annual Conflict of Interest Disclosure Form.

A conflict of interest arises when a applicable individual has an interest in, obligation to, or relationship with any business, property, or person that could affect his/her judgment in fulfilling their responsibilities to USA Karate. All members and employees are expected to refrain from any activity or investment that constitutes, or might appear to constitute, a conflict of interest. They are also required to disclose to the Ethics

Committee any outside activity, relationship or investment in which they are involved or may become involved in that is, or has the potential for appearing to be, a conflict of interest. If anyone requires guidance in this area, your supervisor, the Ethics Officer or USA Karate's CEO should be consulted. For example, a member or employee is not to have a material holding in, or a professional affiliation with, an organization or affiliate with which USA Karate does business or with which USA Karate competes, except as prescribed by USA Karate rules and policies and with the knowledge and approval of the Ethics Officer, who will consult with the full Ethics Committee as appropriate. Members or employees may not use their position at USA Karate to benefit themselves, their relatives, friends or their private enterprises. A family or other personal relationship with a USA Karate member, vendor, or competitor also may present a conflict of interest.

All members and employees must disclose to the Ethics Officer any outside activity, relationship or investment in which they are involved or may become involved that is, or has the potential for appearing to be, a conflict of interest. The Ethics Officer will consult with the full Ethics Committee as appropriate. If there is any question about whether something may constitute a conflict, it is suggested that one seek guidance from his/her supervisor, Ethics Officer or USA Karate's CEO.

#### IX. Business with or in Foreign Countries

Business conduct in foreign countries may sometimes differ from the United States, both in terms of common practice and legality. USA Karate requires that all business matters be conducted in an ethical and legal manner. USA Karate prohibits conducting business with any country or individual on the US Treasury Department Office of Foreign Assets Control (OFAC).

**Gifts:** The giving of gifts to, and receiving of gifts from, foreign nationals or representatives of foreign governments is governed by a complex set of US and foreign laws. Generally, the giving and receiving of such gifts is very limited or prohibited. Before offering a gift to a foreign national, one must receive the approval of the Ethics Officer. In addition, if an exchange of gifts is both a legal and normal practice, the giving and receiving of such gift(s) will be subject to USA Karate's Gift Policy

**Payments:** It is a felony under United States laws for USA Karate, any of its staff, or anyone acting on its behalf to give, offer, promise or authorize a payment to a foreign official, foreign political party or official thereof, or any candidate for foreign political office, for the purpose of corruptly obtaining or retaining business for USA Karate. United States law also makes it a felony to pay money or anything of value to a commission agent, sales representative or consultant when there is knowledge or firm

belief that the payment will be used to corruptly influence a government official in connection with business USA Karate is attempting to obtain or retain. Political contributions will not be made by or on behalf of USA Karate in foreign countries. USA Karate will observe the laws of foreign countries in which it operates concerning payments of agents' fees and commissions, provided these laws are not in conflict with United States law. Members and employees are not to engage in activities designated to circumvent foreign laws concerning retaining or paying sales representatives and consultants.

**Export Control Laws:** It is USA Karate's policy to comply with the export and re-export control rules and regulations under the Export Administration Regulations (EAR) administered by the United States Department of Commerce and the International Trade in Arms Regulations (ITAR) administered by the United States Department of State. Members and employees are not to engage in any export-related transaction on behalf of USA Karate, which would violate these regulations. USA Karate executive management has been instructed to ensure that all who are involved in export-related transactions comply with all applicable export control requirements.

#### X. Business Relationships

It is imperative that all USA Karate supplier, vendor and other business relationships are managed in a fair, equitable, ethical and legal manner consistent with the Code of Conduct, all applicable law and good business practices. Wherever practical, USA Karate provides a competitive opportunity for suppliers and vendors' business, and enlists their active support in ensuring customer expectations are met regarding quality, cost and delivery. Decisions to hire or engage a vendor or supplier should be made on the basis of objective criteria, and not on the basis of personal relationships, friendships or the opportunity for personal gain, financial or otherwise. Prior to entering into a transaction or contract for a purchase or potential purchase that involves an actual or perceived conflict of interest, members and employees should consult with the Ethics Officer.

#### XI. Personal Use of Organization Resources

It is the responsibility of all parties to protect and preserve USA Karate's resources. USA Karate resources include such things as company time, materials, supplies (including food), equipment (including vehicles), information, electronic mail and computer systems, facilities and other property. These resources are provided to fulfill USA Karate's mission and work and are to be maintained and used for authorized USA Karate-related purposes only. The use of USA Karate resources for personal financial

gain is strictly prohibited except where expressly authorized. If there is a question about use of any USA Karate resources, one should contact their supervisor, manager or the CEO. Please report any improper use of USA Karate resources to the supervisor or manager, the Ethics Officer or the Ethics Hotline. USA Karate also has a Gift Policy that applies to giving and receiving any type of entertainment or gifts in connection with an individual's work with USA Karate or its member organizations. The Gift Policy also covers gifts to U.S. state, and local government employees. People should consult the Gift Policy, and if necessary obtain permission pursuant to the policy, before giving or receiving any entertainment or gifts. A copy of the Gift Policy may be found on USA Karate's website:

- **[Gift & Entertainment Policy](#)**

## XII. Political Activities and Contributions

USA Karate and its representatives comply with all federal, state and local laws governing participation in government relations and political activities. Additionally, USA Karate funds or resources are not contributed to individual political campaigns, political parties, or other organizations that intend to use the funds primarily for political purposes. USA Karate also does not permit any political literature, campaign materials or politically orientated information, materials, posters, signs, or buttons to be displayed, circulated or otherwise present on USA Karate property or in the course of conducting work for USA Karate. There are some very limited exceptions to this policy. At times, USA Karate may ask individuals to make personal contact with government officials or to write letters to present USA Karate's position on specific issues. Before doing so, please confirm with the Ethics Officer that such contact is authorized and in compliance with this policy, and that you are knowledgeable on the specific issues about which you have been asked to speak. An individual may, of course, participate in the political process on their own time and at their own expense, so long as they do not give the impression that they are speaking on behalf of or representing USA Karate in such activities. Nor can USA Karate reimburse any personal contributions for such purposes. If an individual is seeking public office, they may use vacation time or request leaves of absence to campaign or hold office. USA Karate will not make contributions to any political candidate or party. The Ted Stevens Olympic and Amateur Sports Act, the Internal Revenue Code and other applicable law require this policy. Please contact the Ethics Officer if there are any questions or concerns regarding these requirements.

## XIII. USA Karate Information



All parties are responsible for the integrity and accuracy of organization documents, communications and financial records. All financial information must reflect actual transactions and conform to generally accepted accounting principles. It is a violation of the Code of Conduct to alter or falsify information, including any record or document, to intentionally make a false or exaggerated statement or claim to anyone, or to mislead anyone. Anyone having concerns regarding questionable accounting or auditing matters should report their concerns to the Ethics Officer or Ethics Hotline, which will refer the matter to the Board of Directors' Audit Committee. USA Karate's information assets are valuable to the organization, and it is USA Karate policy that all USA Karate representatives must diligently protect this information from loss, theft, inadvertent or unauthorized disclosure or misuse. It is essential that everyone do their part to protect USA Karate information, whether stored in computers, files or elsewhere. Members and employees must not discuss with or disclose to any unauthorized persons inside or outside USA Karate any information that is confidential or not publicly available. USA Karate business should not be discussed with unauthorized persons. Be careful about discussing USA Karate information and activities in the presence of, or within hearing distance of, unauthorized personnel. Also, do not seek or accept any information to which any individual and USA Karate are not legitimately entitled, regardless of the source. There is an obligation to maintain the confidentiality and protection of USA Karate information. This obligation does not end even if an individual's employment or other relationship with USA Karate ceases.

#### XIV. Intellectual Property

USA Karate protects the ownership of its intellectual property and respects the intellectual property rights of others. This includes respect for copyrights, trademark rights, patent rights and trade secrets. All parties must refrain from any activity that infringes upon the intellectual property rights of others. In addition, one should contact USA Karate's CEO, who will obtain legal counsel, regarding any anticipated use of intellectual property that does or may belong to someone else.

#### XV. Policy Owner

USA Karate's Ethics Committee and CEO will own this policy and the enforcement of the Policy. Questions about the policy and its enforcement can be directed via email to [ethics@usankf.org](mailto:ethics@usankf.org)

#### XVI. Resources

USA Karate's Governance Documents

The Office of the Athlete Ombuds offers independent, confidential advice to elite athletes regarding their rights and responsibilities in the Olympic and Paralympic movements, and assists athletes with a broad range of questions, disputes, complaints and concerns.

Phone: 719-866-5000

Email: [ombudsman@usathlete.org](mailto:ombudsman@usathlete.org) Website: [usathlete.org](http://usathlete.org)

USOPC Integrity Portal <https://www.usopc.org/reporting-a-concern#:~:text=call%20911%20immediately.-,The%20Integrity%20Portal,-is%20an%20online>

### Athlete Ombuds Confidentiality and Privacy Policy:

(A) In general.—The Office of the Athlete Ombuds shall maintain as confidential any information communicated or provided to the Office of the Athlete Ombuds in confidence in any matter involving the exercise of the official duties of the Office of the Athlete Ombuds. (B) Exception.—The Office of the Athlete Ombuds may disclose information described in subparagraph (A) as necessary to resolve or mediate a dispute, with the permission of the parties involved. (C) Judicial and administrative proceedings.—(i) In general.—The ombudsman and the staff of the Office of the Athlete Ombuds shall not be compelled to testify or produce evidence in any judicial or administrative proceeding with respect to any matter involving the exercise of the duties of the Office of the Athlete Ombuds. (ii) Work product.—Any memorandum, work product, notes, or case file of the Office of the Athlete Ombuds—(I) shall be confidential; and (II) shall not be—(aa) subject to discovery, subpoena, or any other means of legal compulsion; or (bb) admissible as evidence in a judicial or administrative proceeding. (D) Applicability.—The confidentiality requirements under this paragraph shall not apply to information relating to—(i) applicable federally mandated reporting requirements; (ii) a felony personally witnessed by a member of the Office of the Athlete Ombuds; (iii) a situation, communicated to the Office of the Athlete Ombuds, in which an individual is at imminent risk of serious harm; or (iv) a congressional subpoena.

### ACKNOWLEDGEMENT

I have received and read the document entitled “USA Karate Code of Conduct.”

I understand that this Code of Conduct is USA Karate policy, and I agree to abide by all of its requirements.

Signature

Date

Printed Name

Position