

USA Boxing Conflict of Interest Policy

USA Boxing (USAB) is committed to sustaining an ethical work place free of conflicts of interests and perceived conflicts of interests. This Policy applies to USAB's Board of Directors and officers, employees, members of committees, members of hearing panels, task force members, designated contractors and designated volunteers.

For purposes of this Policy, a "conflict of interest" is any relationship, association or circumstance that an individual (or an individual's family member or close associate) has with another person or entity, which relationship, association or circumstance might interfere with the individual's fiduciary obligation to act in the best interests of USA Boxing rather than in favor of any other interest. An association or circumstance can be a family relationship, ownership of business interests, service on the Board of Directors of a different entity, being employed by another entity, the individual's personal aspirations, etc. These are listed by way of example only and not by way of excluding other relationship, association or circumstance. Just as an actual conflict of interest may bar an individual's participation in an activity or decision, a *perceived* conflict of interest may bar an individual's participation as well.

USAB requires that all covered individuals recognize and avoid activities or investments that constitute an actual, potential, or perceived conflict of interest. In order to ensure that all conflicts of interest, potential conflicts of interest and perceived conflicts of interests are properly addressed, all employees, Board of Directors and officers, committee members, officials, hearing panel members, and volunteers with substantial decision-making authority must complete a Conflict of Interest Disclosure Certification Form annually or when they become involved with USAB. All individuals must recognize and attempt to avoid any activity that constitutes an actual or perceived conflict of interest and must update their disclosures when new potential or perceived conflicts arise.

Board meetings, committee meetings, and hearing panels must commence with an identification and resolution and also disclose any potential conflicts of interest (which may be submitted in advance in writing) and the minutes must reflect the disclosures and resolution.

Examples of potential conflicts of interest are listed below. If you are unsure whether a specific activity creates a conflict of interest or perceived conflict of interest, it is better to disclose it.

- You have a personal relationship and work alongside someone else associated with USAB such as you are a parent of a boxer.
- You or a family member own a business, maintain a second job or provide goods or services under a provider, contractor or consulting agreement and the business outside USAB that you are involved with provides goods or services to USAB. For example, USAB is contemplating an agreement with a printer where your spouse works.
- You or a family member acts as an agent, representative, or consultant to a business whose interests may conflict with the interests of USAB.
- You participate in activities or maintain interests that interfere with the satisfactory performance of USAB work assignments on behalf of USAB (this could include outside employment, membership on Boards or any other non-work activity that interferes with your ability to devote your full time to your USAB responsibilities).

- You or your family members are involved in outside Olympic related organizations or committees (whether as an employee, Board member or volunteer) such as Bid Committees, other NGBs, the IOC, NOCs, and PASO.
- You or your family member holds (or formerly held) the position of executive, officer or director of an NGB or other sport organization that interacts with the USAB.
- You or your family members have a business relationship with a sponsor, supplier, licensee or vendor of USAB.
- You or your family members have substantial personal or family financial interest or investments in a potential or actual supplier or sponsor.
- You solicit or accept discounts, gifts or gratuities valued at more than \$150.00 from an entity doing business with USAB or an entity seeking business with USAB.

The disclosure of a conflict or potential/perceived conflict will not necessarily prohibit involvement in the disclosed activity or with USAB. Rather, board member and the Executive Director disclosures will be reviewed by the Ethics Committee and all other disclosures will be reviewed by the Executive Director. Actions may be recommended to protect the individual and USAB from conflicts. These actions may include limitation of involvement, recusing yourself from agenda items, separation from certain USAB conflicts or requests to cease the activity in question. If an actual conflict is identified for a board member, the member of a committee, or the Executive Director, USA Boxing must communicate, in writing, direction on conflict mitigation to the individual involved, which mitigation may include (but not be limited to) the remedial actions listed above.

Anyone with a good faith belief that an individual has an alleged conflict of interest may notify USA Boxing by email to the Executive Director or Ethics Committee; or through the USA Boxing Whistleblower or through the USA Boxing Grievance / Complaint Procedures, both located at https://www.usaboxing.org/about-us/compliance-policies. Reports may be made anonymously, if desired. USA Boxing has zero tolerance for retaliation against an individual for filing a good faith report of a violation or potential violation of this conflicts of interest policy.

The USAB Executive Director or Ethics Committee will investigate all alleged violations of this Policy, including failures to disclose conflicts. All persons involved in any investigation shall be disinterested parties. If USAB has reasonable cause to believe an individual has failed to disclose an actual or potential conflict of interest, USAB will give the individual an opportunity to explain the alleged failure to disclose. After hearing the response and after making further investigation as warranted by the circumstances, USAB will take corrective action such as limitation of involvement, recusing from agenda items, or ceasing the activity in question. USAB will communicate all such decisions in writing to the individual. Any disputes concerning the individual will then (if appropriate) go through the USAB Grievance / Complaint process, which provides resolution from disinterested parties. The Ethics Committee shall also have the power to impose remedial action as necessary to mitigate the violation of the Policy.

USAB's Executive Director is responsible for this policy and its enforcement. The Executive Director can be contacted with any questions about this policy at mmcatee@usaboxing.org

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 USAB, may submit a report using the <u>USOPC Integrity Portal</u>. The Integrity Portal allows individuals to submit concerns to the USOPC confidentially and/or anonymously. Reports may be made online at usopc.ethicspoint.com or by telephone to 877-404-9935.

Team USA athletes may contact the USOPC Athlete Ombudsman Office at ombudsman@usathlete.org 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

Ombudsman can also help Team USA athletes connect with legal counsel or mental health resources if needed. All other athletes are welcome to visit the Athlete Ombudsman website at www.usathlete.org to review informational resources and should work directly with USAB to understand additional resources and options available to them. Or please see the Ombuds Policy located at https://bit.ly/OmbudsPolicy for more information.