

USA Team Handball

Conflict of Interest Policy

SECTION 1. PURPOSE

USA Team Handball is committed to sustaining an ethical workplace free of conflicts of interest and perceived conflicts of interest. Each Affiliated Individual has the responsibility to administer the affairs of USA Team Handball honestly and prudently, and to exercise their best care, skill, and judgment for the sole benefit of USA Team Handball. Those persons shall exercise the utmost good faith in all transactions involved in their duties, and they shall not use their positions with USA Team Handball or knowledge gained therefrom for their personal benefit. The interests of the organization must be the first priority in all decisions and actions.

A “Conflict of Interest” or “Conflict” exists when an Affiliated Individual (as defined below) acts on behalf of USA Team Handball in connection with a transaction to which USA Team Handball is a party, where the Affiliated Individual’s actions or relationships present the potential for improper personal gain or advantage, or for an adverse effect on the interests of USA Team Handball, or where the Affiliated Individual’s actions or relationships create the appearance that the Affiliated Individual will not be able to put USA Team Handball’s interests first. A “conflict of interest” also exists in the context of athlete or team selection when an Affiliated Individual participates in a selection decision that involves or impacts an athlete with whom the Affiliated Individual has a direct or indirect relationship, or when an Affiliated Individual participates in a benefits or services allocation decision that directly impacts the Affiliated Individual. 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 that create conflicts of interest as a guide to the types of transactions (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 Team Handball) and/or relationships that can create conflicts of interest.

USA Team Handball 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.

SECTION 2. PERSONS CONCERNED

This Conflict of Interest Policy is applicable to all USA Team Handball Affiliated Individuals. “Affiliated Individuals” include, but are not limited to, members of USA Team Handball’s Board of Directors, officers, committee members, task force members, hearing panel members, employees, contractors, coaches, interns, and volunteers. Contractors will be required to comply with the Conflict of Interest policy through their written contract.

Anti-Retaliation: USA Team Handball prohibits any retaliation against someone who reports a

potential violation of this policy.

SECTION 3. CIRCUMSTANCES UNDER WHICH CONFLICTS MAY ARISE

Conflicts of interest may arise in the relations of Affiliated Individuals with any of the following third parties: (1) Persons and firms supplying goods and services to USA Team Handball; (2) Persons and firms from whom USA Team Handball leases property and equipment; (3) Persons and firms with whom USA Team Handball is dealing or planning to deal in connection with the gift, purchase or sale of real estate, securities or other property; (4) Competing or affinity organizations; (5) Donors and others supporting USA Team Handball; (6) Agencies, organizations, and associations which affect the operations of USA Team Handball; (7) Family members, friends, and other employees. A “Family Member” is defined as a spouse, domestic partner, parent, or child or a spouse or domestic partner of a child, brother, or sister, or a Family Member of an Affiliated Individual.

A conflicting interest may be defined as an interest, direct or indirect, with any persons or firms mentioned above. The list below is not intended to be an all-inclusive list of every instance that may create a conflict of interest, but, rather, is simply a sample of the types of relationships and activities that could create 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 should be made and the advice sought from the Judicial Committee. A potential conflict of interest might exist in at least the following circumstances:

- 1) Owning stock or holding debt or other proprietary interests in any third party dealing or potentially dealing with USA Team Handball.**

EXAMPLE: When a USA Team Handball Board member owns an interest in a company seeking to enter into a contract to provide consulting services to USA Team Handball.

- 2) Owning a business, maintaining a second job, or providing goods or services under a provider, contractor, or consulting agreement, whereby the outside business provides goods or services to USA Team Handball, the USOPC, or any other USA Team Handball owned entity.**

EXAMPLE: When USA Team Handball is contemplating entering into an agreement for the provision of consulting services by a Board member of USA Team Handball.

- 3) Holding office, serving on the Board, participating in management, or being otherwise employed (or formerly employed) with any third party dealing with USA TEAM HANDBALL.**

EXAMPLE: When a USA Team Handball Board member is the CEO of a company negotiating a contract to provide services to USA Team Handball.

- 4) Serving as an officer of another National Governing Body while serving as an officer of USA Team Handball.

EXAMPLE: When a USA Team Handball Board member is also on the Board of USA SWIMMING.

- 5) Receiving remuneration for services with respect to individual transactions involving USA Team Handball.

EXAMPLE: When a USA Team Handball Board member gets paid a commission if USA Team Handball enters into a particular contract with a third party.

- 6) Using USA Team Handball's time, personnel, equipment, supplies, or goodwill for anything other than USA Team Handball-approved activities, programs, and purposes.

EXAMPLE: When a USA Team Handball employee uses a USA Team Handball vehicle for a personal road trip.

- 7) Soliciting or receiving personal gifts, loans, gratuities, or discounts from third parties in violation of USA Team Handball's Gift & Entertainment Policy. No personal gift of money should ever be accepted.

EXAMPLE: When a company trying to obtain a contract to provide services to USA Team Handball provides a \$100 gift certificate to a USA Team Handball Board member who would be voting on whether USA Team Handball should execute the contract in question.

EXAMPLE: Asking for box seats to a sporting event because of your position on USA Team Handball's Board of Directors.

EXAMPLE: Accepting tickets to an NFL game worth \$250 from a business seeking to obtain a contract to provide landscaping services for USA Team Handball headquarters.

- 8) Acting (or having a Family Member act) as an agent, representative, or consultant to a business whose interests may conflict with the interests of USA Team Handball.

EXAMPLE: when a USA Team Handball Board member agrees to promote another National Governing Body in negotiations with potential sponsors or licensees.

EXAMPLE: when the spouse of a USA Team Handball Board member

works for or is an investor in a company that competes with USA Team Handball or that provides services to a company that competes with USA Team Handball.

- 9) Having (or having a Family Member with) a business relationship with a sponsor, supplier, licensee, or vendor of USA Team Handball.**

EXAMPLE: when a Family Member provides legal services to one of USA Team Handball's sponsors.

- 10) Awarding USA Team Handball business to, or provide favorable treatment to a business owned or controlled by a volunteer, Family Member, or personal friend.**

EXAMPLE: Awarding a contract to provide landscaping services for USA Team Handball headquarters to a Family Member's landscaping business.

- 11) Participating and/or voting within a discretionary USA Team Handball selection committee when the individual has a relationship with an athlete who is potentially impacted by the selection procedures (e.g., as coach, trainer, parent, etc.)**

EXAMPLE: Participating in a decision to select athlete on USA Team Handball's team for World Championships or major international competition when the Affiliated Individual is athlete's current personal coach or Family Member.

- 12) Drafting selection procedures for protected competition when the individual could benefit directly or indirectly from the selection method.**

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.

- 13) Having activities or interests, whether direct or indirect, that interfere with or influence, or have the potential to interfere with or influence, an Affiliated Individual's responsibilities on behalf of USA Team Handball or to undermine the interests of USA Team Handball.**

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

SECTION 4. INTERPRETATION OF THIS CONFLICT OF INTEREST POLICY

The areas of conflicting interest and relations in those areas which may give rise to a conflict, as listed in Section 3, are not exhaustive. Affiliated Individuals should, in the first instance, attempt to avoid all relationships and activities which may give rise to a potential conflict of interest, whether or not listed expressly in Section 3. However, the fact that one of the interests described in Section 3 exists does not necessarily mean that a conflict exists, or that the conflict, if it exists, is material enough to be of practical importance, or if material, that upon full disclosure of all relevant facts and circumstances it is necessarily adverse to the interests of USA Team Handball. However, it is USA Team Handball's policy that the existence of any of the interests described or similar in nature to those described in Section 3 shall 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 shall be the continuing responsibility of each Affiliated Individual to scrutinize his/her transactions and outside business interests and relationships for potential conflicts and to immediately make such disclosures.

SECTION 5. DISCLOSURE POLICY AND PROCEDURE

In addition to the mandatory disclosures required from each Affiliated Individual under Section 10 and Section 11 of this policy, any individual with a good faith belief that an Affiliated Individual has a conflict of interest may notify USA Team Handball's Judicial Committee of such perceived conflict pursuant to the procedures set forth below. Furthermore, should any Affiliated Individual become aware of any undisclosed conflict of interest, or any conflict of interest not fully disclosed, such person should make full disclosure of their knowledge of the conflict of interest involved to the Judicial Committee.

Disclosure should be made to USA Team Handball's Chief Executive Officer and to the Judicial Committee Chair, which shall bring the matter to the attention of the Board. If any disclosures are made during a Board or Committee meeting, they must be disclosed in the minutes.

Contact Information for the USA Team Handball Judicial Committee:

JUDICIAL COMMITTEE: via the internet at: help@handballusa.org

After disclosure of the conflict or potential conflict of interest and all material facts, and after any discussion with the interested person, the Judicial Committee shall decide if a conflict of interest exists pursuant to Section 6 below and communicate to the individual its decision in writing, including if there are mitigating measures that could be implemented to permit USA Team Handball to move forward with the transaction or activity.

Any individual on a panel empowered to resolve grievances must disclose any conflict to be reviewed by the Chair of the Judicial Committee. The Chair of the Judicial Committee will consider the issue and require replacement of the Hearing Panel member, if necessary, per USATH Bylaws section 14.8.

Transactions with parties with whom a conflicting interest exists may be undertaken only if all of the following, at a minimum, are observed:

- 1) The conflicting interest is fully disclosed;
- 2) The person with the conflict of interest is excluded from the discussion and approval of such transaction;
- 3) A competitive bid or comparable valuation exists; and
- 4) The Judicial Committee has determined that the transaction is in the best interest of the organization pursuant to Section 6 below.

SECTION 6. PROCEDURES FOR ADDRESSING POSSIBLE CONFLICTS OF INTEREST WITH RESPECT TO TRANSACTIONS OR BUSINESS OF USA TEAM HANDBALL

In the event a possible conflict of interest exists with respect to a proposed transaction, promptly and before any decision is made regarding the proposed transaction, the proposed transaction shall be addressed as follows:

- 1) The interested person may make a presentation to the Judicial Committee, which may be convened telephonically, regarding the transaction or arrangement involving the possible conflict of interest.
- 2) The Judicial Committee shall review alternatives to the proposed transaction or arrangement as presented to the Judicial Committee by the Board, staff, or relevant committee.
- 3) After exercising due diligence, the Judicial Committee shall determine whether USA Team Handball can obtain with reasonable efforts a more advantageous transaction or arrangement from a person or entity that would not give rise to a conflict of interest.
- 4) If a more advantageous transaction or arrangement is not reasonably possible under circumstances not producing a conflict of interest, the Judicial Committee shall determine by a majority vote whether the transaction or arrangement is in USA Team Handball's best interest, for its own benefit, and whether it is fair and reasonable. In conformity with the above determination the Judicial Committee shall inform the Board or committee whether there is a conflict of interest

precluding USA Team Handball from entering into the transaction or arrangement, or if there are mitigating measures that may be implemented to alleviate concerns regarding the potential conflict of interest.

SECTION 7. PROCEDURES FOR ADDRESSING POSSIBLE CONFLICTS OF INTEREST IN DRAFTING SELECTION PROCEDURES AND ATHLETE / TEAM DISCRETIONARY SELECTION

The following more specific disclosure requirements and procedures apply in the context of drafting selection procedures and athlete/team discretionary selection decisions in order to ensure that no 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 individual involved in the drafting of procedures, including the athlete representative, or on a discretionary selection committee who has a possible conflict of interest must either recuse themselves from the entire process or disclose such potential conflict to the Judicial Committee for review. In the latter situation, the Judicial Committee will first determine if a conflict exists, and in doing so, will ensure that its members or designees involved in such review and investigation are disinterested. If a conflict exists, the Judicial Committee will then determine to what extent, if any, the individual can participate in the process. The Judicial Committee may determine that the individual can still participate in the drafting of the procedures or 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 such 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. There may also be instances where even if the Judicial Committee determines that a conflict exists, the individual can still participate in the entire process. For example, in a sport where a national team coach has worked with all athletes equally in the past, and no bias can be shown towards any one particular individual, then it may be permissible for that national team coach to participate in the process. In no instances will a committee member otherwise influence other members of the committee in the selection process.

Additionally, any person (including any potentially impacted athlete or coach of a potentially impacted athlete) with a good faith belief that an individual involved in the team or athlete selection process has a conflict of interest may report the alleged conflict of interest to the Judicial Committee or file a grievance with the Judicial Committee in accordance with Article 14 of USA Team Handball's Bylaws. Reports (but not grievances) may be made anonymously. Before the selection process may proceed further, the Judicial Committee will: (1) obtain a statement from the supposedly interested person regarding the nature of his/her interest in the selection process; (2) obtain a statement from the reporting party regarding the perceived nature of the conflict of interest, if the report was not made anonymously; (3) exclude from further deliberations both the individual involved in the selection process and the reporting party; (4) determine whether the individual with the alleged conflict of interest in fact has a conflict of interest; and (5) if a conflict of interest is determined to exist, either mandate the individual's

recusal from the process or determine to what extent, if any, that individual can participate in the process.

If an individual is recused and a vacancy on the committee exists, either in the drafting process or on the discretionary selection committee, USA Team Handball shall use its best reasonable efforts to fill that vacancy. If a vacancy results in the athlete representative position, another athlete representative who meets the qualifications for that committee shall be appointed.

SECTION 8. VIOLATIONS OF THE CONFLICTS OF INTEREST POLICY

- 1) If the Judicial Committee has reasonable cause to believe an Affiliated Individual has failed to disclose actual or possible conflicts of interest, it shall promptly inform the Affiliated Individual, in writing, of the basis for such belief and afford the member an opportunity to explain the alleged failure to disclose. Additionally, all parties reviewing and investigating possible conflicts of interest must be disinterested.
- 2) If, after hearing the member's response and after making further investigation as warranted by the circumstances, the Judicial Committee determines the Affiliated Individual has failed to disclose an actual or possible conflict of interest, it shall refer the matter to the Judicial Committee to take appropriate disciplinary and corrective action.
- 3) While any such failure to disclose an actual or possible conflict of interest is under investigation, the Affiliated Individual shall be precluded from engaging in further decisions of USA Team Handball that bear any relation whatsoever to the matter that is the subject of the actual or possible conflict of interest.

SECTION 9. RECORDS OF PROCEEDINGS:

The minutes of the Judicial Committee meetings shall contain:

- 1) The names of the persons who disclosed or otherwise were found to have a connection with an actual or possible conflict of interest, the nature of the conflict of interest, any action taken to determine whether a conflict of interest was present,

and the Judicial Committee's decision as to whether a conflict of interest in fact existed.
- 2) The names of the persons who were present for discussions and votes relating to the transaction or arrangement, or selection process, the content of the discussion (including, but not limited to, an analysis of the fairness and reasonableness of the transaction or arrangement in question, or the fairness of having the individual participate in the selection process), including any alternatives to the proposed transaction or arrangement, and a record of any votes taken in connection with the

proceedings.

Full Board meetings also require disclosure from any individuals who may be conflicted on the business to be discussed. The Board minutes will note both the conflicts/conflicted parties and that those individuals did in fact excuse themselves when the topic was discussed by either leaving the room, hanging up the phone call, or exiting the videoconference during the entirety of the discussion.

SECTION 10. ANNUAL STATEMENTS

Each Affiliated Individual shall annually sign and submit to the Judicial Committee and USA Team Handball's Chief Executive Officer a statement, using the form attached hereto, which affirms such person:

- 1) Has received a copy of the Conflict of Interest Policy;
- 2) Has read and understands the policy;
- 3) Has agreed to comply with the policy, and
- 4) Understands that USA Team Handball is a charitable organization and in order to maintain its federal tax exemption it must engage primarily in activities which accomplish one or more of its tax-exempt purposes. The disclosure statements shall be reviewed by the Judicial Committee.

Any actual, perceived, or potential conflict of interest should be disclosed in the annual statement. Each annual statement shall be reviewed and addressed by the Judicial Committee. The Judicial Committee shall maintain copies of all annual statements submitted under this Section 10.

Any new USA Team Handball employee shall submit a conflict of interest disclosure statement within 14 days of his or her hiring by USA Team Handball. Any other new Affiliated Individual shall 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. In no event shall an Affiliated Individual participate in any decisions to commit USA Team Handball to a proposed

transaction or in athlete or team selection procedures prior to submission of his or her conflict of interest disclosure statement.

The Chief Executive Officer and other officers and members of the USA Team Handball Board of Directors will be reviewed regarding potential conflicts of interest at the Board or committee level.

SECTION 11. PERIODIC STATEMENTS / UPDATES

Each director, officer, committee member, task force member, hearing panel member,



volunteer, independent contractor, and employee shall submit to the Judicial Committee a signed statement as necessary describing any new potential conflicts of interest as and when such potential conflicts of interest arises. The Judicial Committee shall maintain copies of all Periodic Statements or updates submitted under this Section 11.

SECTION 12. ATHLETE OMBUDSMAN INFORMATION

For Athletes With Questions Regarding This Conflict of Interest Policy:

The Athlete Ombudsman provides cost-free, independent and confidential advice regarding athlete rights; resolving disputes or grievances; and any sport rule, policy, or process, including NGB-athlete agreements, codes of conduct or team selection procedures. The Athlete Ombudsman can also help athletes connect with legal counsel or mental health resources if needed. Athletes may contact the Athlete Ombudsman at:

PHONE: (719) 866-5000

EMAIL: ombudsman@usathlete.org

WEBSITE: www.usathlete.org

USA TEAM HANDBALL CONFLICT OF INTEREST DISCLOSURE STATEMENT

I, _____, am a Affiliated Individual with respect to USA Team Handball and provide services in the following role(s):

☐ Board of Directors and Officers

☐ Committee Member

Please specify which committee(s) _____

☐ Task Force Member

Please specify which task force(s) _____

☐ Hearing Panel Member

Please specify which hearing panel(s) _____

☐ Employee

☐ Volunteer

☐ Selection Committee

☐ Other

I attest to the following:

☐ I have received the USA Team Handball Conflict of Interest Policy (the "Policy").

☐ I have read and understand the Policy.

☐ I agree to comply with the Policy.

☐ I understand that USA Team Handball is a charitable organization and in order to maintain its federal tax exemption it must engage primarily in activities which accomplish one or more of its tax-exempt purposes.

Note: This disclosure statement also requires you to provide information with respect to certain other parties that are related to you. These persons are called "affiliated persons" and include, but are not limited to:

a) Your spouse, domestic partner, child, mother, father, brother, sister, grandparent, cousin or other blood relative;

b) Any close associate, or any corporation or organization of which you are a Board member, an officer, a partner, participate in management or are employed by, or are, directly or indirectly, a debt holder or beneficial owner of any class of equity securities; and

c) Any trust or other estate in which you have a substantial beneficial interest or as to which you serve as a trustee or in a similar capacity.

1. Have you or any of your affiliated persons provided services (other than Board/committee/task force/hearing panel/employee/volunteer service) or property to USA Team Handball in the past year?

YES

NO

If yes, please describe the nature of the services or property, and, if an affiliated person is/was involved, the identity of the affiliated person and your relationship to that person:

2. Have you or any of your affiliated persons purchased services or property from USA Team Handball in the past year?

YES

NO

If yes, please describe the purchased services or property, and, if an affiliated person is/was involved, the identity of the affiliated person and your relationship to that person:

3. Please indicate whether you or any of your affiliated persons had any direct or indirect interest in any business transaction(s) in the past year to which USA Team Handball was or is a party.

YES

NO

If yes, please describe the transaction, and, if an affiliated person is/was involved, the identity of the affiliated person and your relationship to that person:

4. Were you or any of your affiliated persons indebted to pay money to USA Team Handball at any time in the past year (other than travel advances or the like)?

YES

NO

If yes, please describe the indebtedness, and, if an affiliated person is/was involved, the identity of the affiliated person and your relationship to that person:

5. In the past year, did you or any of your affiliated persons receive, or become entitled to receive, directly or indirectly, any personal benefits from USA Team Handball or as a result of your relationship with USA Team Handball, that in the aggregate could be valued in excess of \$1,000, that were not or will not be compensation directly related to your duties to USA Team Handball?

YES

NO

If yes, please describe the benefit(s), and, if an affiliated person is/was involved, the identity of the affiliated person and your relationship to that person:

6. Are you or any of your affiliated person a party to or have an interest in any potential or pending legal proceedings involving USA Team Handball?

YES

NO

If yes, please describe the proceeding(s), and, if an affiliated person is/was involved, the identity of the affiliated person and your relationship to that person:

7. Are you aware of any other events, transactions, arrangements or other situations that have occurred or may occur in the future that you believe should be examined by USA Team Handball's Board in accordance with the terms and intent of USA Team Handball's Conflict of Interest Policy?

YES

NO

If yes, please describe the situation(s), and, if an affiliated person is/was involved, the identity of the affiliated person and your relationship to that person:

8. If you are on an athlete selection committee, is there an affiliated person who is an athlete competing for a spot on the team, do you coach an athlete who is competing for a spot on the team, or do you have an immediate family member, employee, or colleague who is otherwise participating in the competition for which the selection committee has been convened?

YES

NO

If yes, please describe the identity of the affiliated person, athlete, or person involved in or impacted by the selection proceedings in question, and your relationship to that person:

I HERBY CONFIRM that my responses to the above questions are complete and correct to the best of my information and belief. I agree that if I become aware of any information that might indicate that this disclosure is inaccurate or that I have not complied with this policy, I will notify the Board or Judicial Committee Chairperson immediately.

Signature Date