



CONFLICT OF INTEREST POLICY
EFFECTIVE DATE: MAY 18, 2022

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

1. Applicability of Policy

This Conflict of Interest Policy is applicable to all USA Wrestling Affiliated Individuals. “**Affiliated Individuals**” include, but are not limited to, board of directors, officers, committee members, task force members, hearing panel members, employees, contractors and volunteers with substantial decision making authority.

2. Definitions

“**Conflict of Interest**” or “**Conflict**” exists when an Affiliated Individual’s activities or interests interfere with, influence, or have the potential to interfere with or influence their responsibilities on behalf of USA Wrestling or undermine the interests of USA Wrestling. 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.

3. Areas in Which Conflicts May Arise

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

- a) Persons or entities supplying goods and services to USA Wrestling;
- b) Persons or entities leasing property or equipment to USA Wrestling;
- c) Persons or entities with whom USA Wrestling is dealing or planning to deal in connection with the gift, purchase or sale of real estate, securities, or other property;
- d) Competing or affinity organizations;
- e) Donors and others supporting USA Wrestling;
- f) Agencies, organizations, and associations which affect the operations of USA Wrestling; or
- g) Family members, friends, and other employees. A **“Family Member”** is defined as a spouse, domestic partner, parent, parent of spouse/domestic partner, child, stepchild, child of a domestic partner, sibling, or the sibling of a spouse/domestic partner of an Affiliated Individual.

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.

4. Interpretation of This Policy

Affiliated Individuals should disclose all relationships and activities which may give rise to a potential conflict of interest.

However, disclosure of a conflict or potential conflict of interest does not necessarily prohibit involvement in the disclosed activity or with the USA Wrestling. For example, the conflict might not be material enough to be of practical importance, or if it is material, it might be possible for the USA Wrestling and Affiliated Individual to implement appropriate mitigating measures upon full disclosure of all relevant facts and circumstances. However, it is USA Wrestling’s policy that the existence of any conflict of interests 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. Further, any disclosure by a member of the board or a committee shall be documented in the minutes of such meeting. It is the continuing responsibility of each Affiliated Individual to scrutinize their transactions and outside business interests and relationships for potential conflicts and to immediately make such disclosures.

5. Disclosure Policy and Procedure

In addition to the mandatory self-disclosures required from each Affiliated Individual under Sections 9 and 10 of this policy, any individual with a good faith belief that another Affiliated Individual has a conflict of interest may notify the USA Wrestling Ethics & Membership Committee of such perceived conflict pursuant to the procedures set forth below. Such notice may be provided anonymously. 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 potential conflict of interest involved to USA Wrestling's Ethics & Membership Committee.

After disclosure of the conflict or potential conflict of interest and all material facts, and after any discussion with the interested person and any other relevant party, disinterested members of the Ethics & Membership Committee will decide if a conflict of interest exists pursuant to the procedures set forth in Section 6 and 7 below, as applicable, and if there are mitigating measures that could be implemented to permit USA Wrestling to move forward with the transaction or activity.

No Retaliation

USA Wrestling prohibits retaliation against anyone who reports a conflict of interest or provides information about a conflict of interest as detailed in this Policy. Retaliation means any adverse or discriminatory action, or the threat of an adverse or discriminatory action, including threatening, intimidating, harassing, coercing, removing from training or competition, or any other conduct that would discourage a reasonable person from engaging or participating in the reporting processes when the action is reasonably related to the report or engagement with the process.

6. Procedures for Addressing Potential Conflicts of Interest

With Respect to USA Wrestling Transactions or Business

In the event a potential conflict of interest exists with respect to a proposed 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:

- a) The interested person may make a presentation to the disinterested members of the Ethics & Membership Committee, which may be convened telephonically, regarding the transaction or arrangement involving the potential conflict of interest.
- b) The interested person will then recuse themselves from any and all discussion and approval (if applicable) of the conflict of interest.
- c) The Ethics & Membership Committee will determine whether an actual or apparent conflict of interest exists. For transactions, the Ethics & Membership Committee may consider whether a competitive bid or competitive evaluation exists.

- d) If the Ethics & Membership 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 Wrestling must take or not take in order to avoid the conflict. The Ethics & Membership Committee may determine in some cases that the USA Wrestling cannot engage in the transaction or arrangement at all due to the conflict or potential conflict of interest. The Ethics & Membership Committee will provide its determination in writing.

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 their ability to make a fair and unbiased decision in the athlete or team selection process.

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

- a) The Interested Person may make a presentation to the disinterested members of the Ethics & Membership Committee, which may be convened telephonically, regarding the potential conflict of interest.
- b) The interested person will then recuse themselves from any and all discussion regarding the potential conflict of interest.
- c) The Ethics & Membership Committee will determine whether an actual or apparent conflict of interest exists
- d) If the Ethics & Membership Committee determines that a conflict of interest is exists, it will either mandate in writing the individual's recusal from the process or determine to what extent, if any, that individual can participate in the process the Ethics & Membership 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 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.
- e) 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.

If the Affiliated Individual is recused and a vacancy on the committee exists, either in the drafting process or on the discretionary selection committee, USA Wrestling will use its

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 will be appointed and approved by a representative group of athletes.

7. Decisions Regarding Conflicts of Interest

Once the Ethics & Membership Committee determines whether a conflict of interest exists, it will send a letter to the impacted individual with its determination and providing direction to such person for managing the conflict, if applicable. The impacted individual will acknowledge in writing receipt of the letter and if there are directives, that the directives must be followed as a condition of membership.

If the Affiliated Individual wants to appeal the conflict of interest decision of the Ethics & Membership Committee they may do so in the form of an Administrative Complaint. The rules for filing an Administrative Complaint are set forth in USA Wrestling's Disciplinary Proceedings and Grievance Policy, which can be found on themat.com.

8. Violations of The Conflicts of Interest Policy

If an Affiliated Individual has reasonable cause to believe an individual has failed to disclose an actual or potential conflict of interest, it will promptly inform the Ethics & Membership Committee. The Ethics & Membership Committee will notify the individual in question of the basis for such violation belief and afford the individual in question an opportunity to explain the alleged failure to disclose.

If, after hearing the individual in question's response and after making further investigation as warranted by the circumstances, the Ethics & Membership Committee (disinterested members only) determines the individual in question has failed to disclose the conflict or potential conflict of interest, it will take appropriate disciplinary and corrective action and provide the same to the individual in question in writing. The Ethics & Membership Committee's decision will be final.

While any such failure to disclose a conflict or potential conflict of interest is under investigation, the individual in question will be precluded from engaging in further decisions of USA Wrestling that bear any relation whatsoever to the matter that is the subject of the conflict or potential conflict of interest.

9. Annual Disclosure Statements

Each Affiliated Individual will annually sign and submit to USA Wrestling a statement, using the standardized form, affirming that they:

- a) Have received a copy of the conflicts of interest policy;
- b) Have read and understand the policy;
- c) Have agreed to comply with the policy, and
- d) Understand that USA Wrestling 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. Each annual disclosure will be reviewed and addressed by the Ethics & Membership Committee.

Any actual, perceived, or potential conflict of interest should be disclosed in the annual statement.

Any new USA Wrestling employee will submit a conflict of interest disclosure statement within 14 days of their hiring by USA Wrestling. Any other new Affiliated Individual will submit a conflict of interest disclosure statement by the earlier of 14 days after their appointment or their first board, committee, or task force meeting. In no event will an Affiliated Individual participate in any decisions to commit USA Wrestling to a proposed transaction or in athlete or team selection procedures prior to submission of their conflict of interest disclosure statement.

Except with regard to the Executive Director, officers, and other board of director disclosures, which will be reviewed by the Ethics & Membership Committee, a staff committee will review the annual statements to determine if there are disclosed conflicts of interest and use reasonable efforts to determine if there are conflicts of interest that should have been disclosed.

USA Wrestling or the Ethics & Membership Committee (as applicable) will send a letter to anyone with a conflict of interest providing direction to such person for managing the conflict. That individual will acknowledge in writing receipt of the letter and that the directives must be followed as a condition of membership.

USA Wrestling will maintain copies of all Annual Statements submitted under this Section 9 in accordance with the document retention policies and procedures.

10. Periodic Statements/Updates

In addition, each Affiliated Individual will submit to USA Wrestling a signed statement as necessary describing any new potential conflicts of interest as and when such potential conflicts of interest arise. USA Wrestling will maintain copies of all periodic statements or updates submitted under this Section 10.

11. Conflict of Interest Policy Questions

USA Wrestling is responsible for this Policy and its enforcement and can be contacted at Compliance@usawrestling.org with any questions about this policy.

For Athletes With Questions Regarding This Conflict of Interest Policy:

The Athlete Ombuds provides cost-free, independent, and confidential advice regarding athlete rights; resolving disputes or grievances; and any sport rule, policy, or process, including USA Wrestling-athlete agreements, codes of conduct or team selection

procedures. The Athlete Ombuds can also help athletes connect with legal counsel or mental health resources if needed. Athletes may contact the Athlete Ombuds at:

PHONE: (719) 866-5000

EMAIL: ombudsman@usathlete.org

WEBSITE: www.usathlete.org

USOCP Ethics and Compliance

The USOPC Ethics and Compliance team accepts reports related to USA Wrestling compliance with the Ted Stevens Olympic and Amateur Sports Act and the USOPC or USA Wrestling Bylaws, including conflicts of interest and governance issues.

Any individual may report concerns confidentially, or anonymously, online using the [USOPC Integrity Portal](#). If preferred, individuals may call the USOPC Integrity Hotline at 1-877-404-9935 to report their concern over the phone.