



Conflict of Interest Policy

Updated December 2022

1. Purpose

USA Triathlon 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 Triathlon honestly and prudently, and to exercise their best care, skill, and judgment for the sole benefit of USA Triathlon. Those persons will exercise the utmost good faith in all transactions involved in their duties, and they will not use their positions with USA Triathlon or knowledge gained therefrom for their personal benefit. The interests of the organization must be the first priority in all decisions and actions. USA Triathlon requires that any of its Affiliated Individuals recognize, attempt to avoid activities or investments that constitute, involve, might appear to constitute or 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, investment, or rights of any kind, the providing or receipt of a grantor loan, or the establishment of any other financial relationship with USA Triathlon.

2. Applicability of Policy

This Conflict of Interest Policy is applicable to all USA Triathlon Affiliated Individuals. “**Affiliated Individuals**” include, but are not limited to, members of USA Triathlon’s Board of Directors (the Board of USA Triathlon), members of the USA Triathlon Foundation Board of Trustees, officers, committee members, task force members, hearing panel members, employees, and volunteers.

3. 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 Triathlon or undermine the interests of USA Triathlon. 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.

4. 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 Triathlon;
- b) Persons or entities leasing property or equipment to USA Triathlon;
- c) Persons or entities with whom USA Triathlon 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 Triathlon;
- f) Agencies, organizations, and associations which affect the operations of USA Triathlon; 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.

5. Examples of Potential Conflicts of Interest

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.

Examples of potential conflicts of interest that must be disclosed are listed below:

- i. Affiliated Individual or their Family Member owns stock or holds debt or other proprietary interests in any third party dealing or who may potentially deal with USA TRIATHLON.
EXAMPLE: A USA Triathlon board member owns a 70% interest in a company seeking to enter into a contract with USA TRIATHLON to provide consulting services.
- ii. Affiliated Individual or a Family Member 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 Triathlon, the USOPC, or any other NGB.
EXAMPLE: USA Triathlon is contemplating entering into an agreement with a HR consulting company owned by a USA Triathlon employee’s husband.
- iii. Affiliated Individual or a Family Member 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 Triathlon.
EXAMPLE: A USA Triathlon board member is the CEO of a technology company negotiating a contract with USA Triathlon to provide IT services.
- iv. Affiliated Individual or their Family Member owns stock or holds debt or other proprietary interests in any third party dealing or who may potentially deal with USA TRIATHLON.
EXAMPLE: A USA Triathlon board member owns a 70% interest in a company seeking to enter into a contract with USA TRIATHLON to provide consulting services.
- v. Affiliated Individual solicits gifts or gratuities using their USA Triathlon role or accepts personal gifts, loans, gratuities, or discounts from third parties in violation of USA

Triathlon's Gifts & Entertainment Policy. No personal gift of money or gift card should ever be accepted.

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

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

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

- vi. Affiliated Individual or a Family Member acts as an agent, representative, or consultant to a business whose interests may conflict with the interests of USA Triathlon.

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

- vii. Affiliated Individual or a Family Member has a business relationship with a sponsor, supplier, licensee, or vendor of USA Triathlon.

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

- viii. Affiliated Individual awards USA Triathlon business to, or provides favorable treatment to, a business owned or controlled by a volunteer, family member, or personal friend.

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

- ix. Affiliated Individual drafts selection procedures or participates and/or votes within a discretionary selection committee of USA Triathlon 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 Affiliated Individual might benefit directly or indirectly from the selection method.

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

- x. Affiliated Individual engages in activities or maintains interests, that interfere with or influence, or have the potential to interfere with or influence, the satisfactory performance of their responsibilities on behalf of USA Triathlon or undermine the interests of USA Triathlon.

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

- xi. USA Triathlon Officer is an officer of another NGB.

6. Gifts Thresholds and Disclosure Requirements

- a) All USAT Affiliated Individuals may keep and are not required to report gifts (whether given or received) valued at less than \$250 (valued at manufacturer's cost)
- b) Sponsor discounts and provided products are not considered gifts
- c) USAT Affiliated Individuals should never give or receive cash or gift cards
- d) If a USAT Affiliated Individual receives a gift and would like to keep it, they should pay the giver the manufacturer's cost value of the item minus \$250
- e) Any gift, whether given or received, valued at \$250 (manufacturer's cost) and over must be disclosed to the Senior Counsel by completing the *USA Triathlon Gift Disclosure Form*

The [USA Triathlon Gifts and Entertainment Policy](#) provides additional guidance regarding gifts and entertainment. The Gifts and Entertainment Policy also applies to USAT Affiliated Individuals who give gifts or entertainment as part of doing business on behalf of USAT.

7. Interpretation of This Policy

The areas of conflicting interest and relations in those areas which may give rise to a conflict, as 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.

However, disclosure of a conflict or potential conflict of interest does not necessarily prohibit involvement in the disclosed activity or with the USA Triathlon. 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 Triathlon and Affiliated Individuals to implement appropriate mitigating measures upon full disclosure of all relevant facts and circumstances. However, it is USA Triathlon'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 and outside business interests and relationships for potential conflicts and to immediately make such disclosures.

8. Disclosure Policy and Procedure

In addition to the mandatory self-disclosures required from each Affiliated Individual under Sections 11 and 12 of this policy, any individual with a good faith belief that another Affiliated Individual has a conflict of interest may notify the USA Triathlon Ethics 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 Triathlon's Ethics Committee.

Affiliated Individuals must disclose conflicts whenever they arise or whenever the Individual becomes aware of them, in addition to annual disclosures. Disclosure is required during board and committee meetings, and disclosures are documented in the board minutes. Board and committee members must disclose any conflicts of interest with the proposed meeting agenda at the beginning of every meeting.

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, the Ethics Committee will decide if a conflict of interest exists pursuant to the procedures set forth in Section 9 below, as applicable, and if there are mitigating measures that could be implemented to permit USA Triathlon to move forward with the transaction or activity.

Affiliated Individuals with conflict(s) that must be managed must acknowledge in writing the direction provided for managing the conflict(s) and that directives must be followed as a condition of membership.

9. Procedures for Addressing Potential Conflicts of Interest

a) With Respect to USA TRIATHLON 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:

- i. 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.
- ii. The interested person will then recuse themselves from any and all discussion and approval (if applicable) of the conflict of interest.
- iii. 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.
- iv. 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 Triathlon must take or not take in order to avoid the conflict. The Ethics Committee may determine in some cases that the NGB cannot engage in the transaction or arrangement at all due to the conflict or potential conflict of interest.

b) 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 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:

- i. The Affiliated Individual may make a presentation to the Ethics Committee, which may be convened telephonically, regarding the potential conflict of interest.
- ii. The Affiliated Individual will then recuse themselves from any and all discussion regarding the potential conflict of interest.
- iii. The Ethics Committee will determine whether an actual or apparent conflict of interest exists
- iv. If the Ethics Committee determines that a conflict of interest is 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 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.
- v. 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 Triathlon will 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 will be appointed and approved by a representative group of athletes.

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's decision will be final.

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

11. Annual Disclosure Statements

Affiliated Individuals identified by USA Triathlon will annually sign and submit to the Ethics Committee and/or USA Triathlon's Senior Counsel a statement, using USA Triathlon's standardized conflict of interest disclosure statement, affirming that they:

- 1) Have received a copy of the USA Triathlon Conflict of Interest Policy (the "Policy");
- 2) Have read and understand the Policy;
- 3) Have agreed to comply with the Policy;
- 4) Understand that all potential conflicts of interest must be disclosed;
- 5) Understand that USA Triathlon encourages proactive disclosures and that transparency regarding all potential conflicts of interest is critical to determine if the potential conflict can be minimized to an acceptable level
- 6) Understand that USA Triathlon 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.

Any actual, perceived, or potential conflict of interest must be disclosed in the annual statement. Each annual disclosure will be reviewed and addressed by the Ethics Committee, Chair of the Board of Directors, Chair of the Board of Trustees, or by USA Triathlon's Senior Counsel or Legal Department.

- i. New Employees. Any new USA Triathlon employee will submit a conflict of interest disclosure statement within 14 days of their hiring by USA Triathlon.
- ii. Other Affiliated Individuals. 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 Triathlon to a proposed transaction or in athlete or team selection procedures prior to submission of their conflict of interest disclosure statement. Examples of other Affiliated Individuals include selection procedure or athlete selection task forces and grievance and disciplinary panel members.

USA Triathlon will maintain copies of all Annual Statements submitted under this Section 11 in accordance with the document retention policies and procedures.

12. Periodic Statements/Updates

In addition, each director, officer, committee member, task force member, hearing panel member, and employee will submit to the Ethics Committee and/or USA Triathlon's Senior Counsel a signed statement as necessary describing any new potential conflicts of interest as and when such potential conflicts of interest arises. USA Triathlon will maintain copies of all periodic statements or updates submitted under this Section 12.

13. Resolution of Violations

The USA Triathlon Ethics Committee investigates potential violations of this policy. The Ethics Committee's ultimate determination is communicated to any relevant parties through the USA Triathlon Senior Counsel. Affiliated Individuals may appeal any Ethics Committee decision by filing a

complaint pursuant to USA Triathlon's Grievance and Disciplinary Policy.

14. Anti-Retaliation Statement

USA Triathlon honors and respects the rights of all people, including USA Triathlon Affiliated Individuals, to report violations of this Code. In addition, pursuant to Section 220501(b)(11) of the Ted Stevens Act, USA Triathlon will not tolerate any adverse or discriminatory action, or the threat of an adverse or discriminatory action, including removal from a training facility, reduced coaching or training, reduced meals or housing, and removal from competition, carried out against protected individuals as a result of any communication, including the filing of a formal complaint, by the protected individual or a parent or legal guardian of the protected individual relating to the allegation of physical abuse, sexual harassment, or emotional abuse, with (a) the Center; (b) a coach, trainer, manager, administrator, or official associated with the corporation; (c) the Attorney General; (d) a Federal or State law enforcement authority; (e) the Equal Opportunity Commission; or (f) Congress.

15. Conflict of Interest Policy Lead

The USAT Senior Counsel is responsible for this policy and its enforcement. In addition, the USAT Senior Counsel will receive copies of any Ethics Committee reports pursuant to this policy and can be contacted at legal@usatriathlon.org with any questions about this policy.

16. Resources

1) Athlete Ombudsman:

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. Additional information can be found at <https://www.teamusa.org/athlete-ombuds>. Athletes may also contact the Office of the Athlete Ombuds.

PHONE: 719-866-5000

EMAIL: Ombudsman@usathlete.org

2) USOPC Ethics & Compliance:

www.teamusa.org/ethics-and-compliance

3) USAT Grievance & Disciplinary Policy:

www.teamusa.org/USA-Triathlon/About/USAT/Governance

USA TRIATHLON CONFLICT OF INTEREST DISCLOSURE STATEMENT

BOARD OF DIRECTORS/ATHLETE REPRESENTATIVE

I, _____, am a member of USA Triathlon and I attest to the following:

- I have received the USA Triathlon Conflict of Interest Policy (the "Policy").
- I have read and understand the Policy.
- I agree to comply with the Policy.
- I understand that I must disclose all potential conflicts of interest on this form.
- I am aware that most conflicts would not disqualify me from my position on the USA Triathlon Board of Directors.
- I understand that USA Triathlon encourages proactive disclosures and that transparency regarding all potential conflicts of interest is critical to determine if the potential conflict can be minimized to an acceptable level.
- I understand that USA Triathlon 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.

Affiliated Persons include your family and other people or organizations close to you. *Affiliated Persons can include:*

- *Your spouse, domestic partner, child, mother, father, brother, sister, grandparent, cousin or other blood relative;*
- *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*
- *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.*

Sport and Community Involvement

Please note all sport and USA Triathlon community involvement. Please state the obvious – even if your involvement is widely known as conflicts are easier to deal with when they are disclosed up front.

A) I own, operate or work at a business that is involved in our sport	Yes	No
If yes, please provide details regarding your role with the business and how the business is involved in our sport:		

B) My <i>family members</i> or <i>Affiliated Persons</i> own, operate or work in a business that is involved in our sport	Yes	No
If yes, please provide details regarding their role with the business and how the business is involved in our sport:		
C) I am actively participating in our sport as a competitor	Yes	No
If yes, please provide details regarding your participation (age group participant, elite license, national team member, etc.):		
D) I am actively participating in our sport as a coach	Yes	No
If yes, please provide details regarding the individuals and/or clubs that you are currently coaching:		
E) I am actively participating in our sport as an official	Yes	No
If yes, please provide details regarding your assigned region and the type of events that you are assigned to officiate:		
F) My <i>family member(s)</i> or <i>Affiliated Person(s)</i> actively participate in our sport as a competitor, official, or other type of participant.	Yes	No
If yes, please provide details regarding their participation in our sport:		
G) I am a USA Triathlon Board member, USA Triathlon Foundation Board of Trustee member, committee member or staff member	Yes	No
If yes, please provide details regarding your role(s) with USA Triathlon:		
H) If you, your <i>family member(s)</i> or <i>Affiliated Person(s)</i> have any additional role(s) with USA Triathlon that are not addressed above, please provide details below:		

Detailed Declaration(s):

Do you or a Family Member own stock or hold debt or other proprietary interests in any third party dealing or who may potentially deal with USA Triathlon?

- Yes
- No
- Not Sure

If yes, or if you are not sure, please provide the following information: Who Holds, or May Hold the Proprietary Interest?

- Me
- An **Affiliated Person**, such as a family member or organization I am a part of
- Both
- Not Applicable *(if you answered No in the question above)*

If someone else, who is that person/organization? *(Type N/A if question is not applicable)*

If someone else, how is this person or organization related to you? *(Type N/A if question is not applicable)*

What is the Proprietary Interest(s) held or that may be held? *(Type N/A if question is not applicable)*

Have you or a Family Member or any of your Affiliated Persons provided services or been associated with a third party that has provided services or property to USA Triathlon in the past year?

- Yes
- No
- Not Sure

If yes, or if you are not sure, please provide the following information: Who was associated with the third party that provided goods or services to USA Triathlon in the past year?

- Me
- An **Affiliated Person**, such as a family member or organization I am a part of
- Both
- Not Applicable *(if you answered No in the question above)*

If an **Affiliated Person** or **both**, who is that person or organization? *(Type N/A if question is not applicable)*

What goods or services were provided to the NGB in the past year? *(Type N/A if question is not applicable)*

Do you or an Affiliated Person own a business, maintain a primary or secondary job, or provide goods or services under an agreement by which the outside business provides goods or services to USA Triathlon, the USOPC, or another NGB?

- Yes
- No
- Not Sure

If yes, or if you are not sure, please provide the following information: Who was associated with the third party that provided goods or services to USA Triathlon in the past year?

- Me
- An **Affiliated Person**, such as a family member or organization I am a part of
- Both
- Not Applicable *(if you answered No in the question above)*

If an **Affiliated Person** or **both**, who is that person or organization? *(Type N/A if question is not applicable)*

What goods and services have been or are to be provided to USA Triathlon? *(Type N/A if question is not applicable)*

Have you or any of your Affiliated Persons purchased services or property from USA Triathlon in the past year?

- Yes
- No
- Not Sure

If yes, or if you are not sure, please provide the following information: Who was associated with the third party that purchased goods or services to USA Triathlon in the past year?

- Me
- An **Affiliated Person**, such as a family member or organization I am a part of
- Both
- Not Applicable *(if you answered No in the question above)*

If an **Affiliated Person** or **both**, who is that person or organization? *(Type N/A if question is not applicable)*

What goods and services have been or are to be purchased from USA Triathlon? *(Type N/A if question is not applicable)*

Do you or an Affiliated Person hold office, serve on the board, participate in management, or are otherwise employed (or formerly employed) with a third party dealing with USA Triathlon?

- Yes
- No
- Not Sure

If yes, or if you are not sure, please provide the following information: Who held office, served on the Board, participated in management or was otherwise employed (for formerly employed) with a third party dealing with USA Triathlon?

- Me
- An **Affiliated Person**, such as a family member or organization I am a part of
- Both
- Not Applicable *(if you answered No in the question above)*

If an **Affiliated Person** or **both**, who is that person or organization? *(Type N/A if question is not applicable)*

What role(s) and/or organization(s) were **you** or your **Affiliated Persons** involved with? *(Type N/A if question is not applicable)*

What dealing(s) did the organization(s) noted above have with USA Triathlon? *(Type N/A if question is not applicable)*

Did 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 Triathlon was or is a party.

- Yes
- No
- Not Sure

If yes, or if you are not sure please provide the following information: Who had a direct or indirect interest in dealing with USA Triathlon?

- Me
- An **Affiliated Person**, such as a family member or organization I am a part of
- Both
- Not Applicable *(if you answered No in the question above)*

If an **Affiliated Person** or **both**, who is that person or organization? *(Type N/A if question is not applicable)*

What direct or indirect interest in a transaction did **you** or the **Affiliated Person** have? *(Type N/A if question is not applicable)*

Do you or a Family Member act as an agent, representative, or consultant to a business whose interests may conflict with the interests of USA Triathlon?

- Yes
- No
- Not Sure

If yes, or if you are not sure, please provide the following information: Who has an interest that may conflict with the interests of USA Triathlon?

- Me
- An **Affiliated Person**, such as a family member or organization I am a part of
- Both
- Not Applicable *(if you answered No in the question above)*

If an **Affiliated Person** or **both**, who is that person or organization? *(Type N/A if question is not applicable)*

What potentially conflicting interest do **you** or the **Affiliated Person** have? *(Type N/A if question is not applicable)*

Were you or any of your Affiliated Persons indebted to pay money to USA Triathlon at any time in the past year (other than travel advances or the like)?

- Yes
- No
- Not Sure

If yes, or if you are not sure, please provide the following information: Who was indebted to USA Triathlon in the past year?

- Me
- An **Affiliated Person**, such as a family member or organization I am a part of
- Both
- Not Applicable *(if you answered No in the question above)*

If an **Affiliated Person** or **both**, who is that person or organization? *(Type N/A if question is not applicable)*

What debt did **you** or your **Affiliated Person** owe to USA Triathlon in the past year? *(Type N/A if question is not applicable)*

Other than direct employment income, did **you** or an **Affiliated Person** make more than \$1000 from USA Triathlon in the past year?

- Yes
- No
- Not Sure

If yes, or if you are not sure, please provide the following information: Who was paid \$1000 or more by USA Triathlon in the past year?

- Me
- An **Affiliated Person**, such as a family member or organization I am a part of
- Both
- Not Applicable *(if you answered No in the question above)*

If an **Affiliated Person** or **both**, who is that person or organization? *(Type N/A if question is not applicable)*

Please describe the benefit and/or income paid to you or the **Affiliated Person**: *(Type N/A if question is not applicable)*

Are **you** or any of your **Affiliated Person(s)** a party to or do **you** or your **Affiliated Person(s)** have an interest in any pending legal proceedings involving USA Triathlon?

- Yes
- No
- Not Sure

If yes, or if you are not sure, please provide the following information: Who is involved in a legal proceeding involving USA Triathlon?

- Me
- An **Affiliated Person**, such as a family member or organization I am a part of
- Both
- Not Applicable *(if you answered No in the question above)*

If an **Affiliated Person** or **both**, who is that person or organization? *(Type N/A if question is not applicable)*

What is the nature of the legal proceeding involving USA Triathlon, you and/or an **Affiliated Person**? *(Type N/A if question is not applicable)*

Are you affiliated with a person who is an athlete competing for a spot on a USA Triathlon national team, are you 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
- Not Sure

If yes, or if you are not sure, please provide the following information: Who is the athlete competing for a spot on a national team, or the coach of an athlete competing for a spot on a national team?

- Me
- An **Affiliated Person**, such as a family member or organization I am a part of
- Both
- Not Applicable *(if you answered No in the question above)*

If an **Affiliated Person** or **both**, who is that person? *(Type N/A if question is not applicable)*

What role do **you** or the **Affiliated Person** play?

- Competing Athlete
- Coach of a Competing Athlete
- Not Applicable *(if you answered No in the question above)*

Do **you** or a **Family Member** have a business relationship with a sponsor, supplier, licensee or vendor of USA Triathlon?

- Yes
- No
- Not Sure

If yes, or if you are not sure, please provide the following information: Who is the person or organization with a business relationship with a sponsor, supplier, licensee or vendor?

- Me
- An **Affiliated Person**, such as a family member or organization I am a part of
- Both
- Not Applicable *(if you answered No in the question above)*

If an **Affiliated Person** or **both**, who is that person? *(Type N/A if question is not applicable)*

What is the nature of the relationship **you** or the **Affiliated Person** has with the sponsor, supplier, licensee or vendor? *(Type N/A if question is not applicable)*

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 and/or would prefer be examined by USA Triathlon's Ethics Committee in accordance with the terms and intent of USA Triathlon's Conflict of Interest Policy?

- Yes
- No
- Not Sure

If yes, or if you are not sure, please provide the following information: Who is the person or organization that you believe there may give rise to a conflict of interest?

- Me
- An **Affiliated Person**, such as a family member or organization I am a part of
- Both
- Not Applicable *(if you answered No in the question above)*

If an **Affiliated Person** or **both**, who is that person? (Type N/A if question is not applicable)

What is the nature of the potential conflict **you** or the **Affiliated Person** may have? (Type N/A if question is not applicable)

All **Athlete Representatives** must disclose any felony convictions, or any other period of ineligibility served in sport such as violations of anti-doping codes, the Athlete Classification Code (Paralympic only), or SafeSport violations. If you do not have any disclosures, please type "none" below.

Would you like to be contacted by a member of the USA Triathlon Ethics Committee to discuss questions or comments about this declaration or to discuss the Conflict of Interest policy further?

- Yes
- No

I HEREBY 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 committee Chairperson or General Counsel/Ethics Committee (as applicable)] immediately.

Signature

Date

Signature - 1st approver (Ethics Committee Chair)

Date

Signature - 2nd approver (USA Triathlon Board Chair)

Date