



CONFLICT OF INTEREST POLICY

Effective Date: April 1, 2024

Introduction

Those who choose to serve the United States Luge Association (USLA), whether as volunteers or paid professionals, are held to a high standard of conduct. As guardians of Olympic ideals, everyone assumes an obligation to subordinate individual interests to the interests of the USLA and the Olympic Movement.

Those who serve the USLA must do so without personal gain, to avoid any institutional loss or embarrassment, and to behave in such a way that the organization's trust and public confidence are enhanced. It is important to recognize and attempt to avoid any activity or investment that constitutes an actual, potential, or perceived conflict of interest. Any individual accepting the honor of serving the United States Luge Association must also accept the burdens of public disclosure and public scrutiny.

In our complex society, an intermix of volunteer work, business interest, governmental activity, and family relationships often create potentially conflicting interests. What is required is disclosure of conflicting interests when they arise, as well as physical absence from, and strict nonparticipation in any evaluation process relating to the matter in question.

The Conflict of Interest Policy ("Policy") does not attempt to provide an exhaustive list of every possible circumstance that might give rise to a conflict of interest, yet provides examples of situations where potential conflicts of interest may or often arise.

Section 1. Application

This Policy applies to the following individuals ("Interested Party/ies")

- a) Employees
- b) Board of Directors
- c) Committee Members
- d) Hearing Panel Members
- e) Volunteers (*with substantial decision-making authority and designated as subject to this Policy by USLA*)
- f) Contractors (*as designated as subject to this Policy by USLA*)

Note: Applicable to Athlete Representatives serving in one (or more) of the above-mentioned categories.

Section 2. Definition

USLA defines a Conflict of Interest as any situation in which an Interested Party (or the Interested Party's family member or close associate's activities) is in a position to derive, or be perceived to derive, personal benefit from actions or decisions made in their official capacity. Further, it is the existence of a personal or financial relationship with the Interested Party (and/or a family member or close associate) that could influence, or be perceived to influence, an Interested Party's objectivity when representing or conducting business for, or on behalf of, the USLA.

A Conflict of Interest also exists in the context of athlete or team selection when an Interested Party participates in a selection decision that involves or impacts an athlete with whom the Interested Party has a direct or indirect relationship. Or, when an Interested Party participates in a benefits or services allocation decision that directly impacts themselves.



For example, (1) an Athlete Representative serves on a committee hearing a team selection grievance wherein they were selected to be on the team in question, (2) an Interested Party benefits financially as part of a contract negotiation on behalf of USLA, or (3) the Board of Directors is contemplating a Conflict of Interest disclosure of a sibling of an Athlete Representative on the Board of Directors.

Section 3. Disclosure

3.01. Procedure for Disclosure

- a) **Annual Disclosure.** All Interested Parties must complete and file with the CEO at ceo@usaluge.org the Conflict of Interest Disclosure Form (Exhibit A) on an annual basis. The disclosure forms for the CEO and Board of Directors must be filed with, and reviewed by, the Ethics Committee at ethicschair@usaluge.org.
 - i. **Material Change.** In the event of a material change in circumstances and/or as new conflicts arise, an amended form must be completed and filed.
- b) **Verbal Disclosure.** In the event of a situation resulting in a real-time verbal disclosure, the CEO should be consulted immediately and a Conflict of Interest Disclosure Form shall be completed and filed as defined in 3.01(a) as soon as possible thereafter.
- c) **Disclosure Review.** The CEO shall compile all Conflict of Interest Disclosure Forms annually, and as new forms are submitted, shall assess any conflict and determine whether the Interested Party with the conflict needs to refrain from participation or decision-making, or if any action is necessary to respond to, or mitigate, the conflict of interest. The same disclosure review will be conducted by the Ethics Committee for the CEO and Board of Directors.
- d) **Information/Inquiries.** The CEO shall make inquiries, gather information, and/or facts as needed to ensure potential conflicts are adequately assessed.
- e) **Decision.** The CEO (or their designee) shall communicate acknowledgement of the disclosure, decision, and/or provide direction for managing conflict to the Interested Party via email. Likewise, the Ethics Committee will communicate via email to the CEO and Board of Directors.
- f) **Managing Conflict of Interest Acknowledgement.** The Conflict of Interest Disclosure Form shall serve as the Interested Party's acknowledgement that all directives for managing conflict will be followed as a condition of membership and/or USLA affiliation.
- g) **Board of Director and Committee Meeting Disclosures.** At the start of each USLA Board of Director Meeting and each USLA Committee Meeting, members must declare conflicts with any anticipated agenda item. These disclosures must be recorded in the minutes along with the associated recusal from the applicable agenda item. This requirement does not supersede the Annual Disclosure requirement outlined in 3.01(a).

3.02. Areas of High Risk

Pursuant to this Policy, all Conflicts of Interest must be disclosed. However, the following areas are deemed high risk and warrant specific attention.

- a) **Interested Parties Involved in the Creation or Enforcement of Selection Procedures.** Any Interested Party involved in the drafting, creation, or enforcement of selection procedures, including the athlete representative, who has a potential conflict of interest **must** disclose the potential conflicts pursuant to Section 3.01(a, b, g).
- b) **Interested Parties Empowered to Resolve Grievances.** Any Interested Party empowered to resolve grievances (e.g. Ethics Committee, Judicial Committee, or Hearing Panels) **must** disclose any potential conflicts pursuant to Section 3.01(a, b, g).

To ensure no Interested Party empowered to investigate potential violations and/or resolve grievances has a conflict of interest, additional protections are provided in the [USLA Grievance Procedures](#).



Section 4. Reporting

The USLA community has the right and responsibility to report alleged Violations of this Policy and USLA encourages the reporting of such allegations.

- a) **Process to Report.** Suspected violations shall be reported to the CEO at ceo@usaluge.org.
- b) **Applicable Policy Exception.** The CEO may redirect a report if, based on the matter reported, it is more appropriate to be addressed under a more applicable policy.

Section 5. Investigation, Resolution, and Enforcement

- a) **Investigate, Resolve and Enforce.** USLA takes its obligation to investigate, resolve and enforce potential violations of this Policy seriously. Any person who violates, or condones the violation of, the Conflict of Interest Policy is subject to disciplinary measures, which may include termination of employment, membership, or expulsion from the board or committee. The CEO, in consultation with the Executive Board, shall review all violations of the Conflict of Interest Policy to determine what, if any, disciplinary action should be taken.
- b) **Decision.** The decision shall be communicated by the CEO (or his/her designee) via email.
- c) **Hearing.** USLA provides for an opportunity to appeal the decision if it has an impact on participation from a Protected Competition. Appeals will be via a hearing pursuant to the [USABS Grievance Procedures](#).
- d) **Disinterested Parties.** Investigation, resolution, and enforcement will be executed by individuals who are unbiased, impartial, and free from conflicts of interests.

Section 6. No Retaliation

USLA will not encourage, allow, or tolerate attempts from any individual or group of individuals to retaliate, punish, allow or in any way harm any Interested Part(ies) who reports a concern in good faith. This applies to Interested Parties before, during, and after the process of resolving a conflict of interest matter. Such actions will be considered a violation of the [USLA Whistleblower and Anti-Retaliation Policy](#).

Section 7. Points of Contact

This Policy serves as a framework for ethical conduct but does not cover every situation. Interested Parties unclear about the requirements of this Policy and/or in need of further information or guidance may contact the following:

CEO

Email: ceo@usaluge.com
Address: United States Luge Association, Inc.
57 Church Street
Lake Placid, NY 12946
Telephone: (518) 523-2071
Fax: (518) 523-4106

In addition, the USOPC Ethics & Compliance team can serve as a secondary resource for concerns regarding violations of this Policy. The USOPC Ethics & Compliance team may be contacted at:

Integrity Hotline: 877.404.9935
Integrity Portal: <https://usopc.ethicspoint.com>



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



EXHIBIT A

CONFLICT OF INTEREST DISCLOSURE FORM

I certify that I have read and understand the Conflict of Interest Policy and that the following information is true and complete to the best of my knowledge. I agree that if there is a material change in any statement or information provided below, I will immediately complete and submit an amended Conflict of Interest Disclosure Form. I further agree that I will adhere to any instruction from the CEO, Ethics Committee, and/or Board of Directors as to the appropriate response to any conflict as a condition of my membership and/or relationship to USLA.

Name (please print)

- Employee Board of Director Contractor
 Committee Member Hearing Panel Member Volunteer

I have no known or anticipated conflict of interest(s), as defined by the USLA Conflict of Interest Policy.

The following are my personal, family, financial, professional, team or business interests that could conflict with the interests of USLA, as defined by the Conflict of Interest Policy:

I am reporting a potential Conflict of Interest with an Interested Party other than myself:

Name: _____

Role (if known): _____

Description of Conflict:

Signature / Date

For internal record keeping only:

No Conflict of Interest Identified. Reviewed on _____ by _____

Conflict of Interest Identified. Reviewed on _____ by _____ .

Ensure all communication requirements of Section 3.01 (Process for Disclosure) have been completed.