



## **Conflict of Interest Policy**

### **1. Purpose**

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

### **2. Applicability of Policy**

This Policy is applicable to all USA Roller Sports Affiliated Individuals. "Affiliated Individuals" include, but are not limited to, members of USA Roller Sports' Board of Directors (the Board of USA Roller Sports), officers (including regional and league officers), committee members, task force members, hearing panel members (i.e., panels empowered to resolve grievances), employees, and volunteers.

All USA Roller Sports contractors must also comply with this Policy in situations and transactions that have implications of necessary and appropriate consideration of actual or potential conflicts of interest. This obligation of compliance shall exist through any written contract

between the contractor and USA Roller Sports and, if there is no written contract, this obligation of compliance shall nonetheless exist in order for the contractor to do business with USA Roller Sports.

### **3. Definitions**

“Conflict of Interest” or “Conflict” exists when an Affiliated Individual’s activities, interests or relationships with third parties, as outlined in Section 4 of this Policy, interfere with, influence, or have the potential to interfere with or influence his or her responsibilities on behalf of the USA Roller Sports or undermine the interests of the USA Roller Sports. 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 Roller Sports;
- b) Persons or entities leasing property or equipment to USA Roller Sports;
- c) Persons or entities with whom USA Roller Sports 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 Roller Sports;
- f) Agencies, organizations, and associations which affect the operations of USA roller Sports; 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.

Examples of potential conflicts of interest that should 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 Roller Sports.

EXAMPLE: A USA Roller Sports board member owns a 70% interest in a company seeking to enter into a contract with USA Roller Sports 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 Roller Sports, the USOPC, or any other NGB.

EXAMPLE: USA Roller Sports is contemplating entering into an agreement with a HR consulting company owned by a USA Roller Sports 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 Roller Sports.

EXAMPLE: A USA Roller Sports board member is the CEO of a technology company negotiating a contract with USA Roller Sports to provide IT services.

- iv. Affiliated Individual uses USA Roller Sports' time, personnel, equipment, supplies, or goodwill for anything other than USA Roller Sports approved activities, programs, and purposes.

EXAMPLE: A USA Roller Sports employee uses a USA Roller Sports vehicle for a personal road trip.

- v. Affiliated Individual solicits gifts or gratuities using their USA Roller Sports role or accepts personal gifts, loans, gratuities, or discounts from third parties in violation of USA Roller Sports Gift & Entertainment Policy. No personal gift of

money should ever be accepted.

EXAMPLE: A USA Roller Sports employee using her position at USA Roller Sports 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 Roller Sports headquarters.

EXAMPLE: A USA Roller Sports board member gets paid a commission if USA Roller Sports 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 Roller Sports

EXAMPLE: A USA Roller Sports 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 Roller Sports (for a current list of USA Roller Sports sponsors, suppliers, and licensees, go to [www.USARollerSports.org](http://www.USARollerSports.org))

EXAMPLE: A USA Roller Sports employee's spouse provides legal services to a USA Roller Sports

sponsor.

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

EXAMPLE: USA Roller Sports 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 Roller Sports 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 Roller Sports employee participating in a decision to select an athlete on USA Roller Sports team for World Championships or major international competition when the USA

Roller Sports 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 Roller Sports or undermine the interests of USA Roller Sports.

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

- xi. USA Roller Sports Officer is an officer of another NGB.

## **5. 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 Roller Sports. 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 Roller Sports and Affiliated Individual to implement appropriate mitigating measures upon full disclosure of all relevant facts and circumstances. However, it is USA Roller Sports 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.

## **6. 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 Roller Sports Compliance, Ethics & Eligibility Committee of such perceived conflict, and shall do so pursuant to the USA Roller Sports Whistleblower Policy. 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 Roller Sports Compliance, Ethics & Eligibility Committee.

Affiliated Individuals must disclose conflicts whenever they may arise or whenever the individual becomes aware of them, in addition to annual disclosures. Specifically, Board members, committee members and members of tribunals or panels must disclose any conflicts when they arise or whenever they become aware of them and disclosure must be documented in the respective minutes of the Board, committee, tribunal or panel, as applicable. In addition, recusal from voting on any matters with respect to which an Affiliated Member has a conflict must also be documented in the minutes.

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 Compliance, Ethics & Eligibility Committee will decide if a conflict of interest exists pursuant to the procedures set forth in Section 7 below, as applicable, and if there are mitigating measures that could be implemented to permit USA Roller Sports to move forward with the transaction or activity.

## **7. Procedures for Addressing Potential Conflicts of Interest**

### **a. With Respect to USA Roller Sports 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 Compliance, Ethics & Eligibility Committee will inform the interested person in writing of the potential conflict of interest and that the matter will be reviewed and

resolved pursuant to the procedures outlined herein.

- ii. The interested person may make a presentation to the Compliance, Ethics & Eligibility Committee, which may be convened telephonically, regarding the transaction or arrangement involving the potential conflict of interest.
- iii. The interested person will then recuse themselves from any and all discussion and approval (if applicable) of the conflict of interest.
- iv. The Compliance, Ethics & Eligibility Committee will determine whether an actual or apparent conflict of interest exists. For transactions, the Compliance, Ethics & Eligibility Committee may consider whether a competitive bid or competitive evaluation exists. The Compliance, Ethics & Eligibility Committee will inform the interested party in writing of its determination.
- v. If the Compliance, Ethics & Eligibility 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 person and/or USA Roller Sports must take or not take in order to avoid the conflict. The Compliance, Ethics & Eligibility Committee may determine in some cases that the USA Roller Sports 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 Compliance, Ethics & Eligibility Committee for review.

The following process will be followed:

- i. The Compliance, Ethics & Eligibility Committee will inform the interested person in writing of the potential conflict of interest and that the matter will be reviewed and resolved pursuant to the procedures outlined herein.

- ii. The interested person may make a presentation to the Compliance, Ethics & Eligibility Committee, which may be convened telephonically, regarding the potential conflict of interest.
- iii. The interested person will then recuse themselves from any and all discussion regarding the potential conflict of interest.
- iv. The Compliance, Ethics & Eligibility Committee will determine whether an actual or apparent conflict of interest exists and will inform the interested party in writing of its determination, including consequences as referred to in the following paragraph.
- v. If the Compliance, Ethics & Eligibility 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 Compliance, Ethics & Eligibility 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.
- vi. 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 Roller Sports 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.

**c. With Respect to Panels Empowered to Resolve Grievances**

The following particularized disclosure requirements and procedures apply in the context of panels empowered to resolve grievances 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 related to the grievance. Any Affiliated Individual involved in resolving a grievance, including the athlete representative, who has a potential conflict of interest must disclose it to the Compliance, Ethics & Eligibility Committee for review before the hearing begins or at any time during the proceedings once the conflict is identified. Additionally, notice of the proposed Hearing Panel appointees shall be provided to all parties involved with the grievance within a reasonable time prior to the hearing. The notice will include an opportunity to object to any appointee for a conflict of interest. In both instances, the following process will be followed:

- i. The Compliance, Ethics & Eligibility Committee will inform the interested person in writing of the potential conflict of interest and that the matter will be reviewed and resolved pursuant to the procedures outlined herein.
- ii. The Interested Person or party involved in the grievance may make a presentation to the Compliance, Ethics & Eligibility Committee, which may be convened telephonically, regarding the potential conflict of interest.
- iii. The Compliance, Ethics & Eligibility Committee will determine whether an actual or apparent conflict of interest exists and will inform the interested party in writing of its determination, including consequences as referred to in the following paragraph.
- iv. If the Compliance, Ethics & Eligibility Committee determines that a conflict of interest is exists, it will either mandate the individual's removal from the process or determine to what extent, if any, that individual can participate in the process
- v. Under no circumstances will a person with an actual or potential conflict attempt to unduly influence other members of the Hearing Panel or Ethics Committee.

If the Affiliated Individual is removed and a vacancy on the Hearing Panel exists, Hearing Panel Chair/Compliance, Ethics & Eligibility Committee 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 the Hearing Panel will be selected by the USA Roller Sports Athletes Advisory Council.

## **8. Violations of the Conflicts of Interest Policy**

If the Compliance, Ethics & Eligibility Committee has reasonable cause to believe an

Affiliated Individual (or contractor, if that is the case, in which event all references hereinafter to Affiliated Individual shall mean the contractor) 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 Compliance, Ethics & Eligibility 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 Compliance, Ethics & Eligibility 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 , or transactions with, USA Roller Sports that bear any relation whatsoever to the matter that is the subject of the conflict or potential conflict of interest.

The USA Roller Sports Compliance, Ethics and Eligibility Committee will make the determination on alleged violations. The Compliance, Ethics and Eligibility Committee will communicate all such decisions in writing to the Affiliated Individual. All determinations on alleged violations are made by disinterested parties.

## **9. Annual Disclosure Statements**

Each Affiliated Individual will annually sign and submit to the Compliance, Ethics & Eligibility Committee and USA Roller Sports' Executive Director a statement, using the standardized form, affirming that they:

- 1) Have received a copy of the Conflict of Interest Policy;
- 2) Have read and understand the Policy;
- 3) Have agreed to comply with the Policy, and
- 4) Understand that USA Roller Sports 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 Compliance, Ethics & Eligibility Committee.

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

Any new USA Roller Sports employee will submit a conflict of interest disclosure statement within 14 days of his or her hiring by USA Roller Sports. Any other new Affiliated Individual will

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 will an Affiliated Individual participate in any decisions to commit USA Roller Sports to a proposed transaction or in athlete or team selection procedures prior to submission of his or her conflict of interest disclosure statement.

USA Roller Sports 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 director, officer, committee member, task force member, hearing panel member, and employee will submit to the Compliance, Ethics & Eligibility Committee a signed statement as necessary describing any new potential conflicts of interest as and when such potential conflicts of interest arises. USA Roller Sports will maintain copies of all periodic statements or updates submitted under this Section 10.

#### **11. Conflict of Interest and Disclosure Review Process**

USA Roller Sports will send out Conflict of Interest and Disclosure forms on an annual basis. Employee and contractor Conflict of Interest and Disclosure forms may be reviewed by the appropriate direct supervisor. The direct supervisor will review the forms to determine if any conflict exists. If no conflict of interest, he/she will sign and date the form. If there is a conflict, he/she will escalate the issue to the Executive Director and/or Compliance, Ethics and Eligibility Committee. The Executive Director and/or Compliance, Ethics and Eligibility Committee will communicate and provide direction to the employee or contractor as necessary. The supervisor will return all completed forms to the USA Roller Sports National Office for safekeeping.

The Compliance, Ethics and Eligibility Committee shall review the Executive Director's, the Board of Directors' and Designated Committee members' Conflict of Interest and Disclosure statements. If there is a conflict, the Compliance, Ethics and Eligibility Committee will escalate the issue to the Board of Directors for review and resolution. In addition, the Compliance, Ethics and Eligibility Committee will work with the Compliance Officer to issue a management direction letter. The Compliance, Ethics and Eligibility Committee will keep minutes pertaining to its review of the Conflict of Interest and Disclosure Statements and, except for matters escalated to the Board of Directors, will return all completed forms to the USA Roller Sports National Office for safekeeping.

All other Conflict of Interest and Disclosure forms will also be reviewed by the Compliance, Ethics & Eligibility Committee to determine if any conflict exists. If no conflict of interest exists, the Chair of the Compliance, Ethics & Eligibility Committee will sign and date the forms. If there is a conflict, the Compliance, Ethics & Eligibility Committee will determine how to resolve the matter, including communication and direction to the Affiliated Individual as necessary.

The Compliance, Ethics & Eligibility Committee will keep minutes of the Conflict of Interest determination meeting(s) and return all completed forms to the USA Roller Sports National Office for safekeeping.

## **12. Conflict of Interest Policy Lead**

The USA Roller Sports Compliance Officer shall be the Policy lead and primary point of contact with respect to responsibility for and questions about this Policy. The Compliance Officer may be contacted at:

PHONE: 402-483-7551  
EMAIL: [compliance@usrollersports.org](mailto:compliance@usrollersports.org)

The USA Roller Sports Compliance, Ethics and Eligibility Committee can be contacted at:  
[compliance@usrollersports.org](mailto:compliance@usrollersports.org)

## **13. For Athletes With Questions Regarding This Conflict of Interest Policy:**

The USOPC Athlete Ombuds 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 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](mailto:ombudsman@usathlete.org)  
WEBSITE: [www.usathlete.org](http://www.usathlete.org)

The USOPC also provides The Integrity Portal – an online reporting platform that allows individuals to confidentially or anonymously report concerns to the USOPC.

WEBSITE: [USOPC | Reporting A Concern](https://www.usopc.org/reporting-a-concern)

## **14. Anti-Retaliation.**

USA Roller Sports prohibits retaliation against anyone who reports or provides information pursuant to this Policy. USA Roller Sports has a zero-tolerance policy for retaliation against people who make good faith reports or who cooperate with investigations of those reports. That means no Affiliated Individual may threaten, harass, discriminate against, or take any negative employment (where applicable) or participation related action (e.g., discharge, demotion, suspension, non-assignment, negative review) on that basis.

