



Conflict of Interest Policy for Employees, Board of Directors, Officers, Committees/Sub-Committees/Task Members, and Volunteers

ARTICLE I – PURPOSE

USA Lacrosse (“USAL”) is committed to sustaining an ethical organization, free of conflicts of interests (COI) and has adopted a COI policy for those involved with USAL. Employees, directors, officers, and members of a committee with Board of Directors (BOD) delegated powers or substantial decision-making authority, and volunteers with substantial decision-making authority (e.g., volunteers shall mean task force members, members, council members, hearing panel members, and others with fiduciary duties to USAL) (collectively referred to as (“Individuals”)) must act at all times in the best interests of USAL. USAL requires that its Individuals recognize and avoid activities or investments that influence, might appear to influence, or could result in a COI. To ensure the COI is properly addressed, all Individuals are required annually to complete a Disclosure Form (Exhibit A). The purpose of the Disclosure Form is to enable the self-identification of any and all COI. This policy is intended to supplement, not replace, any applicable state and federal laws governing conflicts of interest applicable to USAL and may be enforced against Individuals as described below.

ARTICLE II—DEFINITIONS AND EXAMPLES

A. **CONFLICT:** A conflict of interest, actual, potential, or perceived (collectively referred to as “COI”) exists when an Individual’s activities or interests interfere with, influence, or have the potential to interfere with or influence their responsibilities on behalf of USAL or undermine the interests of USAL.

B. **PERSON:** A “Family Member” includes spouse, child, stepchild, parent, sibling, domestic partner, parent of spouse/domestic partner and sibling and child of domestic partner. If a relationship (e.g., close friend or business partner) could influence an Individual’s objectivity, then Individual should apply this policy.

C. **POTENTIAL/PERCEIVED/ACTUAL:** Sample COIs that should be disclosed, include, but are not limited to:

1. Individual owns a business, maintains a second job, or provides goods or services

under a provider, contractor or consulting agreement and that business provides goods or services to USAL.

2. Individual acts as an agent, representative, or consultant to a business whose interests may conflict with the interests of USAL.
3. Individual has a business relationship with a sponsor, supplier, licensee, or vendor of USAL.
4. Individual has substantial (at least 1% of issued and outstanding securities of corporations whose securities are traded publicly) personal or family financial interests in a potential or actual supplier or sponsor. Ownership of mutual funds is excluded from disclosure.
5. Individual solicits/accepts discounts, gifts or gratuities valued at more than \$100.00 USD from an entity doing business with USAL or an entity seeking business with USAL.
6. Individual awards or votes to award USAL business to, or provide favorable treatment to, a business owned or controlled by an Individual. For example, you are a competing athlete, and your parents run a USAL competition that is requesting sanctioning as a USAL national qualifying event.
7. If Individual is an officer of any other governing body of a sport in conflict/competition with USAL.

ARTICLE III – PROCEDURES

A. Duty to Disclose.

1. The disclosure of a COI will not necessarily prohibit involvement in the disclosed activity with USAL.
2. Individual shall disclose the COI to the Judicial Committee, or its designee.
3. Any COI disclosed during a Board or Committee meeting must be disclosed before an agenda item is discussed and must be documented in the minutes of such meeting

B. COI Review Process:

1. USA Lacrosse national volunteers are asked to submit a completed and signed Conflict of Interest form once their volunteer nominations have been approved.
2. The staff member who oversees the national volunteer structure reviews each submitted COI form. If the volunteer has disclosed an actual or potential COI, that information is shared with the Board and Governance Committee Chairs and the CEO. They decide how the information needs to be shared with the full USA Lacrosse Board. The information is shared either at a Board meeting or, if the nature of the disclosure warrants immediate review, via email with the full Board. In all instances, all Board members have an opportunity to comment or ask questions.

C. Reporting Violations of the COI Policy.

1. Any Individual(s) with a good faith belief that another Individual(s) has a COI may notify the Judicial Committee, in writing, of such perceived COI. Furthermore, should any Individual(s) become aware of any undisclosed COI, or any COI not fully disclosed, they

should make full disclosure of their knowledge of the potential COI to the Judicial Committee. Reports may be made anonymously, if desired.

2. All good faith reports of violations of this Policy are protected under the provisions of the **USAL Whistleblower and Anti-Retaliation Policy** [[LINK](#)]. USAL has zero tolerance for retaliation against an individual for filing a good faith report of a violation or potential violation.

D. 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 to ensure that no Individual participating in the process has a COI that will impact their ability to make a fair and unbiased decision in the athlete or team selection process.

Any Individual involved in the drafting of procedures, including the athlete representative, or a member of a discretionary selection committee, who has a potential COI must disclose it to the Judicial Committee for review. The review process shall follow the same procedures as noted in Article III Section B above, along with the following direction.

1. If the Judicial Committee determines that a COI does exist, 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 Judicial Committee may determine that the Individual can still participate in the drafting of the procedures or be included in the discussions for discretionary selection of a team, but not take part in any sign-off, vote, or decision. For example, a national team coach or high performance director may provide 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 COI does not vote toward the final decision.
2. Under no circumstances will an Individual with an actual or potential COI attempt to unduly influence other members of the committee in the selection process.
3. If the Individual is recused and a vacancy on the committee exists, either in the drafting process or on the discretionary selection committee, USAL 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.

E. Failure to Disclose a Conflict of Interest.

1. If an Individual fails to reveal a COI to the Judicial Committee and/or the Judicial Committee becomes aware of this failure to disclose a COI, the Judicial Committee shall report the failure to the USAL Executive Committee. If it is determined by the USAL Executive Committee that there is reasonable cause to believe an Individual has failed to disclose a COI, it will inform the Individual of the basis for such belief and afford the Individual an opportunity to explain the alleged failure to disclose.

If, after hearing the member's response and after making further investigation as warranted by the circumstances, the USAL Executive Committee shall determine if the Individual has failed to disclose a COI, it will take appropriate action. Actions may be recommended to protect USAL from the COI. These actions may include limiting or ceasing the activity in question and/or removal from the applicable volunteer group. The USAL Executive Committee shall have final decision authority.

ARTICLE IV - RECORDS OF PROCEEDINGS

A. The minutes of the BOD and all committees with board delegated powers must contain:

1. The names of the persons who disclosed or otherwise were found to have a conflict, the nature of the conflict, any action taken to determine whether a conflict of interest was present, and the BOD's or committee's decision as to whether a conflict of interest in fact existed.
2. The names of the persons who were present for discussions and votes relating to the transaction or arrangement, the content of the discussion, including any alternatives to the proposed transaction or arrangement, and a record of any votes taken in connection with the proceedings.

ARTICLE V - ANNUAL STATEMENTS

A. To address proactively any potential conflicts of interest, each Individual is required to complete and submit annually a Conflicts of Interest Questionnaire and Disclosure Form affirming that they have read and understand this policy, agree to comply with the policy, agree to disclose any possible conflicts and understand that compliance with the policy is a condition of continued service as an employee, volunteer, director, officer or committee member. The Individual must update the Disclosure Form if any material changes or additions to the submitted information arise during the course of the year or if elected outside the normal certification/appointment timeframe.

The Individual is encouraged to disclose a conflict relationship if there is any uncertainty as to whether the relationship should be disclosed.

ARTICLE VI – APPEALS PROCESS

An Individual may appeal any such disciplinary and/or corrective action under this Policy under the terms of the Complaint/Hearing Procedures.

ARTICLE VII – ADDITIONAL RESOURCES

Covered Individuals who wish to report concerns related to this Policy as it relates to involvement in the Olympic and Paralympic Movement or are uncomfortable reporting a concern directly to their NGB, may also submit a report using the [USOPC Integrity Portal](#). The Integrity Portal allows individuals to submit concerns to the USOPC confidentially and/or anonymously. Reports can also be made online or by telephone.

The Athlete Ombuds provides cost-free, independent, and confidential advice on variety of sport related matters, including their rights, applicable rules, policies or processes, and questions related to resolving disputes and grievances. The Athlete Ombuds can also help Team USA Athletes connect with legal counsel or mental health resources if needed. Athletes may contact the Athlete Ombuds at:

Phone: 719-866-5000

Email:

ombudsman@usaathlete.org

[athleteprotection@usalacrosse.](mailto:athleteprotection@usalacrosse.com)

com Website:

<https://www.usopc.org/athlete-ombuds>

[USOPC Integrity Portal](#)

EXHIBIT A

USA Lacrosse CONFLICT OF INTEREST POLICY QUESTIONNAIRE AND DISCLOSURE FORM

To help avoid any conflicts of interest, as defined in the policy, (attached hereto), all Individuals must disclose any COIs. If at any time following the submission of this form, you become aware of any COI, or if the information provided below becomes inaccurate you agree to notify the Judicial Committee or its designee.

1. Do you, or any family member, have an existing or potential interest in, or compensation arrangement with, any third-party providing goods or services to USAL or with which USAL is currently negotiating?

_____ (YES or NO)

If the answer is yes, please describe in detail below the nature of each such interest or compensation arrangement.

2. Do you, or any family member, actively participate in, have a significant investment in, or own at least a 1% interest in any for-profit with potentially conflicting interests to those of USAL?

_____ (YES or NO)

If the answer is yes, please describe in detail below the nature of each such interest or affiliation.

3. Do you, or any family member, currently hold a paid or unpaid position with any organization that competes with USAL, or that takes a public position contrary to those of USAL?

_____ (YES or NO)

If the answer is yes, please provide the name of the organization below and describe in detail the nature of the position held.

4. Do you have any other interest or affiliation that is likely to compromise your ability to provide unbiased decision-making ability to USAL?

_____ (YES or NO)

If the answer is yes, please describe in detail below the nature of each such interest or

affiliation.

5. Have you or a family member accepted gifts, gratuities or entertainment from any outside concern that does, or is seeking to do business with or is a competitor of USAL?

_____ (YES or NO)

If the answer is yes, please describe in detail below the nature of each such interest or affiliation.

6. If at any time following the submission of this form, you become aware of any COI, or if the information provided becomes inaccurate, do you agree to notify the CEO?

_____ (YES or NO)

Disclosure of Actual or Potential Conflicts of Interest:

I have read the USAL Conflict of Interest Policy set forth above and, as a condition of continued employment or service as a board member, officer, or committee member, I agree to comply fully with its terms and conditions at all times during my service as an employee, volunteer, director, officer, or committee member. I understand that USAL is a charitable and educational organization and that, to maintain its federal tax exemption, USAL must engage primarily in activities that accomplish one or both of its tax-exempt purposes, and that no part of the net earnings of the organization may inure to the benefit of any Individual.

_____ Name (Please print)

_____ Signature _____ Date

_____ Position