

U. S. FIGURE SKATING ASSOCIATION PRINCIPLES OF ETHICAL BEHAVIOR AND CONFLICT OF INTEREST

Those who choose to serve the United States Figure Skating Association (U.S. Figure Skating), whether as volunteers or paid professionals, are held to the highest standards of conduct. U.S. Figure Skating is the national governing body (NGB) of the sport of figure skating and represents our sport to the U.S. Olympic Committee. What may be considered acceptable conduct in some businesses may be inappropriate in Olympic service.

Those who serve U.S. Figure Skating must do so without personal gain, must avoid any institutional loss or embarrassment, and must behave in such a way that the organization's trust and public confidence are enhanced. It is important to avoid any real conflict of interest as well as to avoid even the appearance of a conflict of interest.

While no set of guidelines can guarantee acceptable behavior, the general principles that guide behavior in this area are disclosure, physical absence and nonparticipation in the decision making process where personal or family gain is a possibility, and a commitment to honor the confidentiality of organizational information.

U.S. Figure Skating is not directly comparable to most businesses and in many ways is not comparable to many other sports national governing bodies. One of the purposes of this statement is to provide certain standards that are directly applicable to U.S. Figure Skating and its particular form of governance.

In U.S. Figure Skating, a conflict of interest can arise either as a "representational" conflict of interest or as an "individual" conflict of interest. A representational conflict of interest may arise if you are a representative of another entity (e.g., a U.S. Figure Skating member club, the PSA, or a USOC committee member) and you are concurrently a delegate to Governing Council, a member of the Executive Committee, a member of the U.S. Figure Skating Board of Directors, or serve on U.S. Figure Skating committees. For example, if you are a representative of a U.S. Figure Skating member club and at the same time a member of the U.S. Figure Skating Board of Directors, and an issue comes before the Board of Directors that affects your club financially, you have a representational conflict of interest. As a further example, if you are a member of a U.S. Figure Skating committee and are concurrently a member of a committee of another organization (e.g., PSA or USOC) that is considering proposals or activities that are not favorable to U.S. Figure Skating and its policies, you have a representational conflict of interest. When a representational conflict of interest arises, you must make that conflict of interest known to the chair, and must excuse yourself from participation in the discussion of the issue under consideration unless the chair asks you to remain in the meeting to provide needed information. You must not, of course, vote on a matter in which you have a representational conflict of interest.

An individual conflict of interest will arise when an issue comes before a committee, the Board of Directors or Governing Council that directly affects either you, individually, or directly affects someone in your family, individually. For example, if the Board of Directors is considering your appointment as a judge, referee, or other official (or the appointment of someone in your immediate family), then you must leave the meeting room and you must not participate in the discussion of the subject and must not vote on the issue.

It will not be considered an individual conflict of interest if the issue under consideration affects a class of individuals (e.g., judges) and you happen to be included in that class of individuals, unless the class of individuals is so small that it must reasonably be concluded that the matter under consideration is intended to affect you individually.

In addition, as an officer, director, committee chair, employee, volunteer or member of U.S. Figure Skating, you must:

1. Strive to ensure that U.S. Figure Skating adheres to all applicable rules, regulations and policies of federal, state and local government, and national and international sport governing bodies with which the association is affiliated.
2. Refrain from using U.S. Figure Skating properties, services, opportunities, authority, and influence for private benefit.
3. Devote yourself and U.S. Figure Skating to conduct which, in letter and spirit, is lawful, honest, dependable and fair.
4. Conduct yourself in ways that promote the aims and enhance the reputation of U.S. Figure Skating and figure skating.
5. Place the interests of U.S. Figure Skating ahead of local and personal interests in figure skating.
6. Give prudent consideration to issues affecting U.S. Figure Skating, taking into account established U.S. Figure Skating policies and precedents, the need for confidentiality regarding proprietary and sensitive information, and the legal, financial and administrative effect of proposed actions.
7. Guard confidential information acquired by virtue of your position or employment with U.S. Figure Skating and never permit such information to be used for any person's private gain.
8. Fully inform responsible U.S. Figure Skating officials in a timely documented form of matters about which those officials may be unaware, including not only business opportunities, policy alternatives, and organizational needs, but also any actions, no matter who is responsible for those actions, which are contrary to policy or are damaging to U.S. Figure Skating, or which are unethical or unlawful.

9. Assist U.S. Figure Skating's employees, volunteers, and directors to create and maintain an effectively functioning organization, always respecting the responsibility and authority of those to whom implementation of U.S. Figure Skating policies and goals has been entrusted.
10. Provide a full, constructive and timely reply in the form required to requests from U.S. Figure Skating officials for information and decisions.
11. Neither give nor receive gifts, loans or favors that tend to influence you in the discharge of your duties, except those of nominal value exchanged in the normal course of business.
 - A. The trading of pins and mementos is accepted conduct.
 - B. Invitations from sports, media, or other organizations to attend sports and social events of more than nominal value may be accepted if they are part of open and generally accepted practices, serve to promote the best interest of U.S. Figure Skating, would not embarrass the individual or U.S. Figure Skating if publicly disclosed and do not compromise the objectivity or integrity of the recipient or donor.
 - C. Gifts and favors of more than \$100 value should not ordinarily be accepted, but if the circumstances render it awkward to refuse such a gift the donor should be thanked and told that the gift is being accepted on behalf of, and will be delivered to, U.S. Figure Skating.
12. Disclose the nature and extent of an actual or potential conflict of interest when it occurs in the evaluation of an issue and must abide by the guidelines pertaining to a representational conflict of interest and an individual conflict of interest.
13. Complete a conflict of interest form if you are included in the group of individuals required to do so.
 - A. The completion of this form is a prerequisite for participation with U.S. Figure Skating.
 - B. Annually, the internal auditor, working with the Ethics Committee, shall send to each appropriate person a disclosure statement form concerning the conflict of interest policy. These forms are to be completed and returned to the internal auditor and will then be available only to the president, executive director, legal counsel (when necessary) and the Ethics Committee.
 - C. The Ethics Committee will review these disclosures and will maintain the information so revealed in confidence. Each individual should openly and forthrightly identify any areas that represent a potential conflict of interest. Individuals will contact the chair of the Ethics Committee to update or amend their disclosure forms as circumstances change.

- D. Each individual will disclose all of the directorships and officer positions held in for-profit or not-for-profit organizations, as well as any consulting and employment relationships in any concern with which you have reason to believe U.S. Figure Skating does business or from which U.S. Figure Skating will secure goods or services, and which you have reason to believe may be affected by your actions on behalf of U.S. Figure Skating. Individual or family ownership in business ventures where more than five percent of the total value of the company is owned or where more than 10 percent of the outstanding shares are owned, requires disclosure.
- E. Each individual will also disclose family relationships in which you or your immediate family are employed by or render services to any outside concern that does business with U.S. Figure Skating. "Family" is defined to include spouse, children, parents, brothers and sisters.
- F. Each individual will also disclose any confidential information of U.S. Figure Skating that has been used or disclosed for any purpose other than to carry out your duties.

14. Exhibit honesty, loyalty, candor and professional competence in your relationships with U.S. Figure Skating and with each other.

- A. Travel is a significant cost of conducting the association's business. Those who travel at the expense of U.S. Figure Skating have the responsibility to adhere to U.S. Figure Skating policies and to assist in reducing costs associated with travel.
- B. Accurate and reliable records are of critical importance to the association. Individuals must ensure the accuracy of all U.S. Figure Skating accounts, reports, bills, invoices, records, and correspondence. U.S. Figure Skating documents or information from records may not be released to anyone outside the association without the consent of the Board of Directors.
- C. U.S. Figure Skating employees shall report only true and actual numbers of hours worked by them. Reporting, charging or shifting costs to inappropriate contracts or budget accounts is prohibited.

15. Make every reasonable effort to avoid the appearance of conflict of interest and unethical behavior. Appearance can be as damaging to U.S. Figure Skating as actual violations.

This statement sets both general principles and certain specific standards. Where specific standards are set forth, you must abide by those standards.

CONFLICT OF INTEREST DISCLOSURE FORM

Pursuant to U.S. Figure Skating's Code of Ethics, I hereby disclose that I or members of my immediate family have the following affiliations or interest and have taken part in the following transactions that, when considered in conjunction with my position with or relation to U.S. Figure Skating, might be required to be disclosed pursuant to U.S. Figure Skating's Principles of Ethical Behavior and Conflict of Interest. Check "NONE" where applicable.

Gifts, Loans and Favors	<p>You may not request or receive gifts, loans or favors that tend to influence you in the discharge of your duties with U.S. Figure Skating. This rule does not apply in the case of an occasional nominal gift of insignificant value in the normal course of business.</p> <p>Identify any gifts, loans or favors described above that you have received.</p>	NONE
Confidential Information	<p>Identify any confidential information pertaining to the U.S. Figure Skating, its officers or officials that you have used or disclosed for any purpose other than to carry out your duties and obligations to U.S. Figure Skating.</p>	NONE
Incompatible Employment	<p>Identify any circumstances in which you or your immediate family is an employee, partner, officer or owner of a business entity that renders services to or does business with U.S. Figure Skating.</p>	NONE
Outside Interests	<p>Identify any business in which you are or any member of your immediate family holds an ownership in a closely-held business entity (including a sole proprietorship, corporation, limited liability company or partnership) or a 5% or greater interest in a public company that does business with U.S. Figure Skating.</p>	NONE
Interest Acquired	<p>Identify any interest you have acquired in any contract or transaction at a time you believe or had reason to believe that such interest would be affected by any action of U.S. Figure Skating.</p>	NONE
Other Conflicts	<p>A conflict of interest can be considered to exist in any instance where your actions or activities on behalf of U.S. Figure Skating also involve obtaining an improper gain or advantage or involve an adverse effect on U.S. Figure Skating interest, or in instances where your actions are improperly influenced by another person.</p> <p>Identify any such circumstances that give rise to a possible conflict of interest you may have in your service to U.S. Figure Skating.</p>	NONE

Both sides of this form must be signed for it to be valid.

I hereby agree to report to the chair of the U.S. Figure Skating Ethics Committee any future conflicts of interest if any other conflicts develop before completion of my next conflict of interest form.

Full Name (Print or Type)

U.S. Figure Skating Member Number

Position

Signature

Date

U. S. FIGURE SKATING
PRINCIPLES OF ETHICAL BEHAVIOR AND CONFLICT OF INTEREST
CERTIFICATION FOR DIRECTORS, EMPLOYEES AND OTHER AGENTS OF
U.S. FIGURE SKATING

I, _____, certify that I have read and understand the Principles of Ethical Behavior and Conflict of Interest of the United States Figure Skating Association, (U.S. Figure Skating). I agree to comply with the Principles and affirm that, to the best of my knowledge and belief, I am not involved in any activity and have no interest that conflicts or suggests a potential conflict with the best interest of U.S. Figure Skating; except as follows (if none, so state):

I also agree, during the term of my tenure with U.S. Figure Skating, to report to the chair of the U.S. Figure Skating Ethics Committee promptly any future situation that involves or might appear to involve me in any conflict with the best interest of U.S. Figure Skating.

Signature

Date

DUE DATE: