# USA TRACK & FIELD, INC. NATIONAL OFFICE STAFF CONFLICT OF INTEREST POLICY (A SUPPLEMENT TO THE USA TRACK & FIELD CODE OF ETHICS)

Effective January 1, 2007 the Board of Directors passed an organizational Code of Ethics for Board members, national office employees, independent contractors and members of committees, sub-committees, councils, task forces and any other decision-making body of USATF. As indicated in this organizational Code of Ethics, national office staff is included among those required to comply.

Given the status of national office staff as paid employees of the organization with rights, privileges and responsibilities unique among those mentioned in the organizational Code of Ethics, it is imperative that we are held to the most stringent of standards within the organization. The purpose of this policy is to supplement the organizational Code of Ethics for all national office employees and create a higher level of both accountability and transparency.

It is important that all national office staff members review both the organizational Code of Ethics and this supplemental policy to gain a full understanding of your responsibility. It is very important that you clearly understand both policies and comply with all reporting requirements and deadlines.

The policy and attached examples refer to "nominal value" and "thresholds." These are terms used in the organizational Code of Ethics and can be confusing. All employees should interpret the policy to mean that <u>all</u> possible conflicts should be reported on the attached form to me – this includes all lunches or small gifts. We realize this may increase the reporting burden on a few of you, but it is important that the national office be viewed as a leader and above reproach in this regard. This does not mean that you are not allowed to accept an occasional lunch or small gift from a vendor, event organizer, or sponsors, it just means that you should report those to the COO. This will allow the national office staff to be in complete compliance with the policy and avoid any confusion on what is or is not material.

If the amount, frequency, or nature of any meal or gift from a vendor, sponsor, or other party becomes a concern, the COO and CEO will meet with the individual involved prior to taking any action.

No employee of USA Track & Field (USATF) shall derive any personal profit or gain, directly or indirectly, by reason of his or her decisions or activities while employed by USATF. In addition, USATF employees should decline all gifts, discounts, excessive hospitality and other transactions due to perceived and real conflict of interest implications. Certain independent contractors, as determined by the CEO, are also bound by this policy. This excludes the normal compensation and benefits due each employee or contractor.

#### Specifically:

- Each individual shall disclose to the COO any personal interest that he or she may have in any business matter pending before USATF and shall refrain from participation in any discussion, evaluation, or decision on such matter. Business matters refer to vendor relationships, sponsorships, competitions/events, or other agreements.
- USATF employees or independent contractors may not serve on any committee or task force of USATF except when designated by the President or CEO as "staff liaison."
- Any employee or consultant who is, or has an immediate family member who is an
  officer, board member, a committee member, employee or consultant or staff member of a
  USATF vendor, sponsor, event organizer or member organization shall identify his or her
  affiliation with such company or organization. Further, in connection with any action
  specifically directed to that company or organization, he/she may not participate in any
  discussion, evaluation or decision affecting that company or organization at the discretion
  of the CEO.
- Any employee or consultant shall not accept any of the following, if more than of a
  nominal value, from a vendor, sponsor, event organizer or member organization of
  USATF: gifts, discounts, travel, excessive or inappropriate hospitality, loans or other
  transactions that result in a personal benefit. The determination of nominal value shall be
  determined by the CEO and/or COO. If it is not practical to decline the gift, the item(s)
  shall be delivered to the COO for company use.
- This policy extends to *prospective* sponsors, vendors, event organizers or member organizations, and the affected persons are required to report, either verbally or in writing, as soon as possible and, in all cases, no later than the date of action (e.g., Board vote, contract signing).

All transactions with vendor, sponsor, event organizer or member organization, regardless of amount or value, shall be disclosed in a written statement to the COO as soon as reasonably possible. In the case of violations of this policy, including non-disclosure or non-allowed personal benefit, the CEO shall undertake appropriate disciplinary action as provided in the employee handbook. The CEO, at his discretion and where possible, may also terminate all contracts, agreements and arrangements with the related organization, vendor or sponsor.

## USA Track & Field Conflict of Interest Statement:

I have reviewed both the USA Track & Field, Inc. Code of Ethics and the supplemental national office staff Conflict of Interest policy for staff and independent contractors. Except as noted on this form, I confirm that I am in full and complete compliance with the provisions of that policy. Further, I confirm that I will continue to abide by the terms of the policy and will inform the COO of any potential non-compliance.

Signed:	Date:
Print Name:	
Matters to Report (include dates and dollar amounts, where applicable):	

#### USA Track & Field Conflict of Interest Policy

#### Examples of Conflicts of Interest:

- Employment
- Direct holdings or ownership interests (equity/stock, bonds, options)
- Personal services contracts ("contractor" arrangements such as consulting projects)
- Sale of goods or services to the company or organization, except for those at "arm's length" (still must be disclosed)
- Loans
- Provision of travel or accommodation
- Gifts of money in any amount
- Gifts of goods or services in excess of \$25 separately or \$100 in aggregate per year (minor amounts must still be disclosed in your statement to the CEO)
- Discounts not available to the general public
- Excessive hospitality defined as meals or entertainment in excess of \$25 separately or \$100 in aggregate per year with the exception of meals and entertainment provided at USATF or related events that are available to other USATF staff (minor amounts must still be disclosed in your statement to the CEO)
- Illegal or other inappropriate hospitality defined as activities that may place USA Track & Field in a bad light when viewed from outside the organization

Remember, all potential conflicts must be reported unless a nominal amount (as defined in the listing above, subject to future amendment). Items above that do not define the threshold for "nominal" must be reported regardless of amount.

#### List of Sponsors and Vendors

As of 1/2023 – list is not exhaustive and is subject to change.

### Sponsors/Partners/Suppliers

- Built Bar
- Comcast Cable Communications
- Garden of Life
- Gatorade
- Hershey
- HTWO Hydrogen Water
- Hyperice
- KT Tape
- NBC
- Next College Student Athlete
- Nike
- Sport:80
- Thundertech
- Toyota
- TrackTown Events, LLC
- United Canvas & Sling

#### **Local Organizing Committees**

- Astra Partners LTD.
- Atlanta Track Club, Inc.
- Board of Trustees of the University of Arkansas
- Cherry Blossom Inc.
- Great Cow Harbor-10 Kilometer Run Inc.
- Indiana Sports Corporation
- Jacksonville Track Club, Inc.
- James Joyce Ramble, Inc.
- Kentucky Track & Cross Country Coaches Association
- Long Island Track & Field, Inc.
- Mad City 100K, Inc.
- Mt. San Antonio College
- New Haven Road Race, Inc.
- New York Road Runners, Inc.
- New York Track & Field, Inc.
- Red Newt Racing, LLC
- Riverbank Events and Media LLC
- Run To You Racing, LLC
- Sacramento Running Association
- SIX03 Endurance
- The Armory Foundation
- TrainingRX, LLC
- Twin Cities in Motion
- Upstate Event Management
- USATF Pacific Association
- We Run Events

#### Vendors

- Bevilacqua Helfant Ventures
- Carr-Hughes Production
- Carte Blanche Catering
- CRE 130, LLC
- Denison Parking
- Edgewood Partners Insurance (EPIC)
- Enterprise Rent-A-Car
- Expedient/Continental Broadband
- First Insurance Fund
- Flash Results, Inc.
- Global Athletics
- Hightech Signs-North
- Infinity of Minnesota
- IPFS Corporation
- JHE Production LLC
- JPMorgan Chase
- JTA Pacific
- King & Spalding, LLP
- Main Event
- National Center for Safety Initiatives
- Nike
- PF Realty, LLC
- Prime Time Timing
- Rock-It Cargo
- RSM US LLP
- Sport:80 USA
- Tahor 26 Owner LLC
- Track Town Events
- United Healthcare
- University of Oregon
- USADA
- USATF Foundation
- USOPC
- World Athletics