

UNITED STATES ROWING ASSOCIATION CODE OF CONDUCT - June 2019

I. INTRODUCTION

United States Rowing Association (“USRowing”) is the National Governing Body for the sport of rowing in the United States. USRowing selects, trains and manages rowing teams that represent the United States in international competition and serves to promote the sport of rowing on all levels of competition.

This document delineates the principles and procedures for defining, preventing violations of, disclosing, and remediating violations of USRowing’s ethical and conduct standards (the “Code”). Included within the scope of those standards are potential, real, or perceived conflicts of interest, unethical conduct, and conduct detrimental to USRowing and/or its objects and purposes as set forth herein. This document applies to all USRowing members, athletes, referees, employees, board members, committee members, volunteers, event participants, coaches, trainers, and officers (“USRowing Persons”).

II. SCOPE OF THE CODE

This Code provides a set of rules and standards that apply to all USRowing Persons. The Code requires all activities that involve or are governed by USRowing to be carried out with the appropriate ethical and legal standards consistent with the best interests of USRowing and its Bylaws. These obligations apply to relationships and interactions with athletes, member organizations, USRowing Persons, third-parties, subcontractors, independent contractors, vendors, consultants, governments and the general public. The standards set forth in the Code are mandatory and must be followed by all USRowing Persons.

III. LEGAL AND REGULATORY COMPLIANCE

USRowing requires all USRowing Persons to abide by all applicable United States federal, state, and local laws, including the Ted Stevens Olympic and Amateur Sports Act, U.S. Center for SafeSport directive and regulations, and foreign laws, as applicable.

The Code operates in tandem with the policies and procedures of USRowing, and with all applicable U.S. and foreign laws and regulations. Where more than one set of laws, regulations, local customs, or norms exist, USRowing Persons shall use the highest standard of behavior or the most restrictive requirement that applies.

IV. MORAL AND ETHICAL CONDUCT

While representing USRowing, or while otherwise engaged in conduct relating to or which reasonably could reflect upon USRowing, all USRowing Persons shall:

- a. Maintain high standards of moral and ethical conduct;
- b. Abstain from the use of illegal drugs and from excessive consumption of alcohol;
- c. Not commit a criminal act;
- d. Abide by all USRowing SafeSport Policies and Procedures, including:
 - i. USRowing Safe Sport Policy (www.USRowing.org/SafeSport);
 - ii. U.S. Center for SafeSport code and procedures (www.SafeSport.org); and
 - iii. Athlete Protection Policy and other requirements found within the USRowing Internal Policies and Participant Safety Handbook; and
- e. Abide by the applicable rules of competitions in all events (whether USRowing or international) entered.

V. LEADERSHIP RESPONSIBILITIES

USRowing Persons holding positions of leadership within USRowing must exercise their responsibility in a manner that:

- a. Creates an environment for USRowing Persons to raise concerns and new ideas regarding the Code;
- b. Ensures that USRowing Persons have sufficient information to comply with applicable laws, regulations, and policies;
- c. Provides the resources to resolve ethical concerns;
- d. Creates a culture that promotes the highest standards of ethics and conduct;
- e. Encourages all USRowing Persons to share concerns with appropriate personnel when they arise; and
- f. Does not sacrifice ethical and compliant behavior in the pursuit of other USRowing objectives.

VI. CONCERN FOR THE WELFARE OF OTHERS

USRowing Persons shall seek to contribute to the welfare of USRowing participants, athletes and members and must:

- a. Promote a culture of empowerment with a focus on athlete health and safety;
- b. Comply with mandatory reporting requirements established by federal law, the U.S. Center for SafeSport and the USRowing SafeSport Policy;
- c. Proactively address potentially harmful behavior or an unsafe environment;
- d. Be sensitive to power imbalances; and
- e. Resolve conflicts in a professional manner.

VII. CONFLICTS OF INTEREST

No USRowing Person shall have a direct or indirect interest in, or material relationship with, any outside organization or person, or with an internal entity or person, that might affect (or might reasonably be perceived by others to affect) the objectivity or independence of that individual's judgment or conduct in carrying out her/his duties and responsibilities to USRowing.

Examples of such conflict of interest include, but are not limited to:

- a. Directly or materially benefiting from personal involvement with grantees, suppliers, sponsors, agents or members of USRowing;
- b. Accepting material payments, services and/or loans from such an entity;
- c. Holding a material relationship with another international rowing federation, National Olympic Committee or national governing body which might impact one's judgment or the performance of an individual as an athlete, coach or representative of USRowing;
- d. Engaging in outside employment which might impact that Individual's job performance, efficiency or employment with USRowing; and
- e. Owning or acquiring property as a result of confidential information obtained through one's position with USRowing, or which property was impacted by USRowing action.

All situations involving a conflict of interest in a business relationship or in outside activities should be reported and/or approval obtained as described in this section. Reporting a questionable situation does not imply a conflict of interest or impropriety, but affords the opportunity of review and obtaining the necessary approval, if appropriate.

A USRowing Person who is an employee with a conflict or potential conflict shall make full disclosure of the nature and extent of the actual or potential conflict of interest to the Chief Executive Officer. USRowing Persons who are officers, Board Directors or Committee members of USRowing will make full disclosure to the Chair of the Ethics and Governance Committee of the Board of

Directors. The Ethics and Governance Committee of the Board of Directors will determine the existence of the conflict and appropriate action, if needed.

USRowing Persons in position of conflict are precluded from participating in any further consideration of, or action related to, the conflict matter; however, individuals may be requested to provide information on the transaction in question and answer questions from the relevant authority. The existence of a conflict or potential conflict on the part of a Board Director, officer, director, or Committee member will be reported in the minutes of a Committee or Board meeting or, in the case of a staff member, noted in the personnel file.

Violation of this conduct policy is grounds for dismissal as a Board Director, Committee member, national team athlete, national team coach or USRowing officer or employee, and may result in the imposition of a sanction, which includes (without limitation) suspension or termination of USRowing membership.

A conflict of interest disclosure statement will be developed and circulated to Board Directors, officers, Committee members, certain volunteers and employees at least once a year.

VIII. BUSINESS COURTESIES—GIFTS & ENTERTAINMENT

No USRowing Person shall encourage or accept gifts or gratuities for themselves, their families or friends from any outside person or organization having, or seeking to have a relationship with, USRowing. If any person should receive any unsolicited gifts, those gifts should be considered a contribution to USRowing and shall be immediately turned over to USRowing through any officer or the CEO as a contribution from the original source.

Unsolicited gifts or gratuities of less than \$100 may be retained, but shall be fully disclosed as to the parties, purpose and amount.

Minor business courtesies such as payment for normal meal costs are permitted when arising from business connected with the activities of USRowing. Entertainment with an individual valued in excess of \$100 shall be fully disclosed as to the parties, purpose and amount.

IX. USE OF INFORMATION AND ASSETS

No USRowing Person shall use for her/his personal gain, or disclose outside of USRowing, any confidential information obtained through her/his association with USRowing. This includes (without limitation) spoken, written and computer-generated data. This also includes (without limitation) confidential information or trade secrets obtained through her/his association with USRowing as an employee, athlete, referee or coach, such as training and high-performance plans.

No USRowing Person shall use for her/his personal gain trademarks, logos, intellectual properties or copyrighted materials owned by USRowing, unless authorized in writing by USRowing.

No USRowing Person shall make any illegal or unethical payments from the assets or resources of USRowing or in a capacity representing or acting on behalf of USRowing.

All USRowing Persons shall be responsible for prevention of the loss, damage, misuse or theft of property, records, funds, equipment or other assets belonging to USRowing.

X. APPLICATION

Questions regarding the application or interpretation of this Code of Conduct should be directed to the USRowing Director of SafeSport, the Chief Executive Officer (CEO) or a member of the USRowing Board of Directors Ethics Committee.