

USRowing Code of Conduct (version: January 2014)

The United States Rowing Association ("USRowing" or the "Association") expects and requires all persons associated with USRowing to conduct Association business with integrity and to maintain the highest standard of personal conduct and ethics in the affairs of USRowing.

Conflict of Interest

No USRowing employee, director, officer, committee member, athlete (defined as an individual training at a USRowing/USOC center or named to a national team), referee, volunteer, event participant, coach, trainer (an "Individual") shall have a direct or indirect interest in, or material relationship with, any outside organization or person, or with an internal entity, 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 the Association.

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

- Directly or materially benefiting from personal involvement with grantees, suppliers, sponsors, agents or members of USRowing;
- Accepting material payments, services and/or loans from such an entity;
- 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;
- Engaging in outside employment which might impact that Individual's job performance, efficiency or employment with USRowing;
- 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.

Improper use of Information and Assets

No Individual 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 athlete or coach, such as training and high performance plans.

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

No Individual 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 Individuals shall be responsible for prevention of the loss, damage, misuse or theft of property, records, funds, equipment or other assets belonging to USRowing.

Gifts, Gratuities and Entertainment

No Individual 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.

Moral and Ethical Conduct

Individuals shall (a) maintain high standards of moral and ethical conduct; (b) abstain from the use of illegal drugs and from immoderate consumption of alcohol; (c) not commit a criminal act while representing USRowing; (d) abide by the Athlete Protection Policy found within the USRowing Internal Policies and Participant Safety Handbook, and (e) abide by the rules of competition in all events entered.

Administration

This code will be provided and posted annually on the USRowing website under the governance section and association employees will receive and acknowledge the statement of policy at the beginning of employment. The Code is not intended to supersede any other policy (i.e. National Team Agreement or Bylaw on Member

Misconduct, etc.) but is intended to complement and strengthen those documents and the Association.

Handling a Conflict of Interest

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.

An employee shall make full disclosure of the nature and extent of any actual or potential conflict of interest to the Chief Executive Officer. All other Individuals will make full disclosure to the Chair of the Ethics Committee of the Board of Directors. The Ethics Committee of the Board of Directors will determine the existence of the conflict and appropriate action, if needed.

Individuals 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 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 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 directors, officers, certain volunteer and employees at least once a year.