



POLICY GOVERNING CONFLICT OF INTEREST & ETHICAL PRACTICES

Those who choose to serve USA Nordic Sport, whether as volunteers or paid professionals, are held to a high standard of conduct. Because we operate in the public spotlight, we are expected to conduct our affairs on a basis consistent with the great trust placed in us. With the honor of serving USA Nordic Sport, one must also accept the burden of public disclosure and public scrutiny. This requires our behavior to conform to the highest ethical principles.

USA Nordic Sport requires that its volunteers and staff conduct business with integrity and pursuant to USA Nordic Sport's core values. Furthermore, because the appearance of impropriety can be just as damaging as actual impropriety, conduct which appears to be improper is also unacceptable. Conflicts of interest are inevitable and most are not inherently improper if properly disclosed, reviewed and the conflicted individual removed or recused from the decision-processes pertinent to the situation(s), transaction(s) and/or person(s) of conflict.

All Directors, Officers, Committee Chairs, employees and members of USA Nordic Sport must agree to the following:

1. Ensure that USA Nordic Sport adheres to the applicable rules, regulations and policies of federal, state and local government, and the United States Olympic and Paralympic Committee (USOPC), International Ski Federation (FIS), and any other sports governing bodies with which the federation is affiliated.
2. Devote themselves to conduct that, in letter and spirit, is lawful, honest, dependable, and fair.
3. Conduct themselves in ways that promote the aims and enhance the reputation of USA Nordic Sport and the ski jumping and Nordic combined sports.
4. Place the interests of the entire USA Nordic Sport ahead of any local, regional, business or personal interests in the ski jumping and Nordic combined sports.
5. Protect information that belongs to USA Nordic Sport, our donors, sponsors, volunteers and employees.
6. Avoid conflicts of interest, both real and perceived.
7. Never use USA Nordic Sport's assets or information for personal gain.
8. Fully inform responsible USA Nordic Sport authorities pursuant to USA Nordic Sport's *Policy on Reporting and Investigating Allegations of Suspected Improper Conduct and Activities* of actions, no matter who is responsible for those actions, which are improper, unethical, unlawful, contrary to this policy or otherwise damaging to USA Nordic Sport.
9. Assist employees, volunteers, officers, and directors to create and maintain an effectively functioning organization always respecting the responsibility and authority of those to whom implementation of USA Nordic Sport policies and goals has been entrusted.
10. Provide a full, constructive, and timely reply in the form required to requests from USA Nordic Sport for information.



11. Neither give nor receive gifts, loans or favors that tend to influence you in the discharge of your duties, except of nominal value exchanged in the normal course of business.
 - The trading of pins and mementos is accepted conduct.
 - Invitations from sports, media, corporations, 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 USA Nordic Sport, would not embarrass the individual or USA Nordic Sport if publicly disclosed and do not compromise the objectivity nor integrity of the recipient or donor.
 - Gifts and favors of more than \$25 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 the gift is being accepted on behalf of, and will be delivered to, USA Nordic Sport.
12. All employees, volunteers, officers and directors will disclose the nature and extent of actual, perceived, or potential conflict of interest when it occurs in the evaluation of an issue and will not participate in the discussion, evaluation or voting on the matter involved. This includes the awarding of contracts, purchase of goods and services, and allocation of USA Nordic Sport's resources.
13. If any individual representing USA Nordic Sport participates in the evaluation or approval of a contract with a supplier to furnish goods or provide services to USA Nordic Sport when the individual will directly or indirectly benefit financially or otherwise receive any form of compensation from, or have an interest in, any supplier or provider under consideration, then USA Nordic Sport shall have the right to recover such benefit or payment and such contract or transaction shall be voidable by USA Nordic Sport.
14. All directors, officers, committee chairs, and key staff will be required to complete a Conflict of Interest (COI) form.
 - The completion of this form is a mandatory prerequisite for participation with USA Nordic Sport.
 - Annually or prior to assumption of responsibilities, USA Nordic Sport Office Manager, under the auspices of the Governance and Nominating Committee of the USA Nordic Sport Board of Directors, shall send to each appropriate person the latest ethics and conflict of interest information. The Conflict of Interest Disclosure form is to be completed and returned to the USA Nordic Sport Office Manager and will then be available only to the Chair of the Board, the Executive Director, legal counsel and the USA Nordic Sport Governance and Nominating Committee.
 - The USA Nordic Sport Governance and Nominating Committee will review and evaluate these disclosures and will maintain this information in strict confidence. Each individual should openly and forthrightly identify any areas that represent a potential COI. Individuals will promptly contact the USA Nordic Sport Office Manager to update or amend their disclosure forms as circumstances change.



15. The principles provide a framework of integrity for interactions with or on behalf of USA Nordic Sport. However, more in depth questions may arise regarding conflicts of interest. For this reason, the following guidance is given:

USA Nordic Sport defines a conflict of interest as any personal or financial relationship that could influence or be perceived to influence your objectivity when representing or conducting business for, or on behalf of, USA Nordic Sport.

For instance, if personal or financial interests exist with any person or entity with whom USA Nordic Sport has a business or other relationship, or which could be perceived to influence your conduct, you must:

- Disclose the interest or nature of the relationship to the USA Nordic Sport Governance and Nominating Committee for further consideration; and
- Excuse yourself from any formal or informal discussions related to the relationship between USA Nordic Sport and the person or entity; and
- Abstain from voting and from seeking to influence the vote on any matter related to the person or entity.

16. Any person who violates or condones the violation of this policy is subject to disciplinary measures that may include termination of membership, employment, and expulsion from volunteer positions. The USA Nordic Sport Governance and Nominating Committee shall review all violations of this policy pursuant to the USA Nordic Sport's Policy on Reporting and Investigating Allegations of Suspected Improper Conduct and Activities and, if appropriate, recommend sanctions to the USA Nordic Sport Board of Directors (as to volunteers) or the Executive Director (as to employees of USA Nordic Sport).

17. This policy serves as a framework for ethical conduct but does not cover every situation. If you are unclear about the requirements of this policy, please consult your supervisor (if an employee) or the chair of the Governance and Nominating Committee (if a volunteer).

Understood and Agreed to:

Name: _____

Date: _____

Approved May 21, 2021