

## **USWCA Conflict of Interest and Code of Ethics Policy**

The United States Women's Curling Association ("USWCA") requires its Officers, Parliamentarian, Immediate Past President, and all Committee Chairs ("Leaders") to maintain the highest standards of ethics and propriety in activities and relations with all parties. This includes conducting business with integrity and maintaining a standard of ethical conduct consistent with the regulations of the State of Illinois in which USWCA is incorporated. Furthermore, because the appearance of a conflict of interest or impropriety can be just as damaging as an actual conflict of interest or impropriety, conduct that appears to be improper is also unacceptable.

The USWCA is adopting this formal Conflict of Interest and Code of Ethics Policy to provide guidance to its Leaders in adhering to its ethical standards and to avoid conflicts of interest.

The following principles govern this Conflict of Interest and Code of Ethics Policy:

- The business of the USWCA is to be conducted in observance of both the spirit and the letter of applicable federal and state laws.
- No set of guidelines can guarantee acceptable behavior. The guidelines set out below are not a precise map to acceptable conduct. They are signposts. Each individual must find her own way.
- Leaders who serve the USWCA must avoid any real conflict of interest as well as avoid the appearance of any conflict of interest.
- All conduct is founded on the individual's own sense of integrity. Leaders who accept the honor of serving the USWCA must also accept the burdens of public disclosure and public scrutiny. Properties, services, opportunities, authority and influence of the USWCA are not to be used for private benefit.
- Leaders are expected to exhibit honesty, candor and professional competence in relationships with other individuals, be they inside or outside the USWCA, in the context of their USWCA work.
- Other volunteer work, business interests, government activity and/or family relationships may create potentially conflicting interests. Leaders are required to disclose conflicting interests when they arise; they also need to be physically absent from, and cannot participate in, any evaluation process relating to the matter in question.
- Leaders must use these guidelines to help assess whether a conflict of interest, or the appearance of a conflict of interest, may exist. If there is a conflict of interest, or the appearance of a conflict of interest, it must be disclosed. It is understood that some real or potential conflicts of interest do not become evident until some new matter comes before the Board of Directors or a Committee for evaluation and possible action. These situations cannot always be covered in advance by completing the Conflict of Interest and Code of Ethics Policy Disclosure Statement.
- If there is any doubt as to the presence of a real or perceived conflict, any connection one may have with the matter at hand must be disclosed.
- After reading this Conflict of Interest and Code of Ethics Policy, the initial assessment of whether to vote or to abstain from discussing and voting on the matter at hand is

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up to the individual. In considering your decision, remember that the USWCA values your judgment, your discussion input, and your vote. However, you always have the obligation to raise any known or potential perceived conflict to the President. As discussed in this document, the President or your Committee Chair may choose to excuse you from discussing and voting on a given matter based upon an actual or perceived conflict of interest.

- Gifts, cash, travel, hotel accommodations, entertainment, or favors are neither to be given nor received, except those of nominal value exchanged in the normal course of business. The trading of pins and mementos is acceptable conduct. Sports, media, entertainment and other organizations may invite USWCA personnel to attend sports and social events of more than nominal value. Such invitations may be accepted if they are part of open and generally accepted practice, serve to promote the best interests of the USWCA, and would not embarrass the individual or the USWCA if publicly disclosed, and does not compromise the objectivity and integrity of the recipient or donor. Gifts and favors of more than one hundred dollars value should not ordinarily be accepted. If 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 the USWCA and will be delivered to the President.
- Leaders have the responsibility to maintain the confidentiality of the USWCA, as to USWCA proprietary and sensitive information.

In view of these principles, USWCA adopts the following Conflict of Interest and Code of Ethics Policy:

1. Officers, Parliamentarian, Immediate Past President and all Committee Chairs (collectively referred to as "Leaders") shall adhere to the highest standards of honesty, good faith, and fair dealing in all activities relating to USWCA. They shall know, understand, and comply with the laws, regulations, and codes of conduct governing the conduct of USWCA business. Leaders shall recognize that even the appearance of misconduct or impropriety can be very damaging to the reputation of the USWCA and act accordingly.
2. No Leader, or any member of her immediate family or household, shall knowingly accept gifts, gratuities, or favors of any kind from any person, firm, or corporation doing business or seeking to do business with USWCA that could reasonably be expected to influence, or create the appearance of influencing, the Leader's actions relating to USWCA. This prohibition is not intended to preclude business meals or other nominal gifts, gratuities, or favors.
3. All Leaders shall honor the confidentiality of USWCA matters.
4. No Leader shall use USWCA assets, information, or relationships for personal gain.
5. Without full and complete disclosure to and approval by the President, no Leader or any member of her respective immediate family or households shall have any position of influence with, or a material financial interest in, any corporation or other entity that conflicts, or could reasonably be expected to conflict, with the proper performance of the Leader's duties or responsibilities to USWCA, or which could

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reasonably be expected to affect the Leader's independent judgment and action with respect to transactions between USWCA and such other entity.

6. Annually at the beginning of the fiscal year, the Secretary shall send a copy of this Conflict of Interest and Code of Ethics Policy and a copy of the disclosure statement to each Leader in which they will fully disclose the nature and extent of any actual or potential conflict of interest. This disclosure statement shall be completed, signed and returned to the Secretary and reviewed by the President. Each new Leader shall participate in a similar procedure upon assumption of his or her responsibilities if part way during the year.
7. In addition to the annual reporting referred to above, upon learning of a conflict, potential conflict or appearance of a conflict of interest, a Leader shall provide the President with a full and complete written disclosure of all facts of the position, interest, transaction or situation.
8. All Leaders, when considering a matter for which an actual or potential conflict of interest exists, will avoid evaluating, or in any other way influencing, directly or indirectly, or voting on the matter involved. At the discretion of the President (or 1<sup>st</sup> Vice President if the matter involves the President), a Leader may be asked to be physically absent during any evaluation and/or vote. Potential matters include, but are not limited to, the award of contracts, the purchase of goods and services, the allocation of USWCA resources, and USWCA relationship with other curling organizations.
9. After due consideration of a matter of conflict of interest or perceived conflict of interest with respect to a Leader, the President shall submit a confidential report to the Officers (if the matter at hand involves said President, the confidential report shall be submitted by the 1st Vice President) concerning any action, position or interest of a Leader that may present a potential conflict, actual conflict, or appearance of conflict of interest. The Officers shall take such action as it believes is appropriate based on the information provided by the President or 1<sup>st</sup> Vice President.
10. In the event that USWCA wishes to enter into a transaction or relationship that creates a conflict of interest, or an appearance of a conflict of interest, involving a Leader, the details of such a proposed transaction or relationship shall be reported to the Board of Directors, which shall thereafter approve or reject the proposed transaction by resolution (with the affected person(s) abstaining if applicable).
11. The President shall administer this Policy with respect to a Leader, and any disputed action of the President with respect to this Policy shall be resolved by the Executive Council.
12. USWCA shall post a copy of this Conflict of Interest and Code of Ethics Policy on the USWCA website where it may be reviewed by Leaders, USWCA members, and external parties.