



CODE OF CONDUCT POLICY
EFFECTIVE DATE: SEPTEMBER 1, 2021

Purpose:

USA Wrestling has adopted this Code of Conduct to support its Mission and Core Values with the expectation that the people who work for, or on behalf of, USA Wrestling shall conduct themselves consistent with same.

I. Introduction

Mission: USA Wrestling, guided by the Olympic Spirit, provides quality opportunities for its members to achieve their full human and athletic potential. USA Wrestling accomplishes this mission through its commitment to its Core Values of:

- *Responsibility* - Fulfilling all functions, tasks, duties and assignments with trust and credibility on behalf of USA Wrestling by honoring promises and pledges.
- *Integrity* - Being true to self and the mission of USA Wrestling, while discerning right from wrong and acting on it.
- *Dedication* - Dedication to carrying out the mission and goals of USA Wrestling with the highest degree of sacrifice and discipline.
- *Honesty* - Being truthful and upright with people and issues in furthering the mission of USA Wrestling.
- *Accountability* - Providing answers and reasons to others for actions and behaviors intended to support the mission of USA Wrestling.
- *Respect* - Recognizing the absolute dignity in every human being, with a sense of compassion, caring and concern for the well-being of other people.
- *Diversity* - Creating a culture that welcomes members of all races, gender, religion, sexual orientation, and ethnicities; embracing equity, inclusion, and multicultural awareness that helps to effect lasting, meaningful change.

II. Applicability

This Code of Conduct applies to all employees, volunteers, board members, officers, committee and task force members, contractors and member organizations and individual members of USA Wrestling.

III. Reporting Obligations

No code of conduct can address every situation, nor can it take the place of good judgment and integrity. USA Wrestling maintains an “open door” for anyone who has questions or concerns. USA Wrestling will support all efforts to comply with this Code of Conduct. If you need advice or assistance concerning the application of any aspect of these standards, consult your supervisor or manager, or USA Wrestling’s General Counsel. You are expected to seek advice and clarification promptly when you are uncertain about proper actions or practices.

You should be alert and sensitive to situations that could result in unethical, illegal, or improper actions. You have an obligation to report potential or actual violations of this Code of Conduct to your supervisor or manager, USA Wrestling’s General Counsel, the Chair of the Ethics & Membership Committee, or any other designated reporting authority identified by USA Wrestling.

Under no circumstances will an individual be subject to any disciplinary or retaliatory action for filing, in good faith, a report of a violation or potential violation of the Code of Conduct. However, filing known false or malicious reports will not be tolerated, and anyone filing such reports will be subject to appropriate disciplinary action.

IV. Legal Compliance

USA Wrestling requires that you follow the Code of Conduct and abide by all applicable USA Wrestling and United States Olympic & Paralympic Committee rules, policies, and procedures; United States federal, state, and local law as applicable, including the Ted Stevens Olympic and Amateur Sports Act, codified at 36 U.S.C. §§ 22501 – 22529; and foreign law as applicable. If you ever encounter a conflict of law, such as a conflict between United States and foreign law or have any questions about the legality of any action, contact USA Wrestling’s General Counsel for further information and guidance.

V. Commitment to Integrity

USA Wrestling is committed to honesty and integrity as the cornerstone of our activities. In turn, USA Wrestling expects you to conduct yourself in an ethical and legal manner as a representative of USA Wrestling. This requires that you:

- Respect the rights of all individuals to fair treatment and equal opportunity, free from discrimination or harassment of any type, including, without limitation discrimination on the basis of race, color, religion, sex, sexual orientation, disability, gender identity, age, national origin, pregnancy, childbirth or related medical conditions, genetic information, veteran status, or any other characteristic protected under applicable federal, state, or local law.¹
- Know, understand, and comply with all applicable laws, regulations, and codes of conduct.
- Ensure that all USA Wrestling work and transactions are handled with honesty and recorded accurately.
- Protect information that belongs to the USA Wrestling, our workers, volunteers, members, and customers.
- Never use USA Wrestling assets or information for personal gain.
- Recognize that even the appearance of misconduct or impropriety can be very damaging to the reputation of USA Wrestling and act accordingly.

USA Wrestling recognizes that wagering on Olympic and other USA Wrestling-sanctioned events and on athletes where they are participating in those events, for example sports book bets and fantasy sports programs that have the possibility of valuable winnings (“Olympic Wagering”), is legal and regulated in the State of Nevada and in a number of foreign jurisdictions. At the same time, it is critical to the avoidance of actual and/or apparent conflicts of interest and to the overall integrity of the Olympic Movement that no person involved in the Movement promote, support, or otherwise engage in Olympic Wagering. Thus, you must at all times refrain from directly or indirectly:

- 1.Engaging in Olympic Wagering;
- 2.Promoting Olympic Wagering;
- 3.Facilitating or otherwise supporting Olympic Wagering;
- 4.Knowingly sharing confidential athlete, team, or competition information with a person or entity involved in Olympic Wagering; or
- 5.Attempting to influence the course or result of any competition in connection with Olympic Wagering

If anyone approaches you about engaging in items 2-5 above, you have an obligation to disclose this, as set out in Section III above.

Additionally, USA Wrestling finds sexual, emotional, and physical abuse intolerable and in direct conflict with Olympic ideals. USA Wrestling is committed to ensuring that it and its employees, volunteers, board members, officers, committee and task force members, contractors, member organizations and members promote an environment free from such abuse; and such

¹ It is acknowledged that, as to gender and gender identity, this prohibition on discrimination does not extend to decisions on eligibility and classification for the purposes of sport competition; such decisions may well, for example, be based on gender for any particular event.

commitment extends not only to USA Wrestling's workplace, but also to the creation of safe sporting environments for athletes. To that end, USA Wrestling forbids any form of sexual, emotional, or physical abuse, whether in the workplace or outside it, and including instances involving athletes. You have a duty to report any alleged sexual, emotional, or physical abuse occurring in the workplace or at any USA Wrestling supported training or sport activity as set forth in USA Wrestling's Safe Sport Program Handbook (including, but not limited to the Minor Athlete Abuse Prevention Policy) to USA Wrestling's General Counsel or at safesport@usawrestling.org.

VI. Ethics Program

USA Wrestling has established an Ethics & Membership Committee in its Bylaws and hired a General Counsel who reports jointly to the President of the Board of Directors and the Executive Director. The Ethics & Membership Committee established in the USA Wrestling Bylaws creates, implements, and oversees violations of this Code of Conduct, Ethics and Conflict of Interest Policies. The USA Wrestling General Counsel will monitor ethics reports and conduct ethics education at USA Wrestling. The General Counsel works closely with the Chair of the Ethics & Membership Committee to ensure that the Ethics & Membership Committee is involved in ethics issues as appropriate.

The Ethics Committee will review and investigate matters of ethical impropriety and make recommendations and/or render decisions on such matters to the Board as appropriate. If the matter involves an individual's right to participate, the Ethics & membership Committee will provide an opportunity for a hearing as set forth in Section XII of the USA Wrestling Bylaws and its Disciplinary & Grievance Procedure.

In all instances, those handling the matter on behalf of the Ethics & Membership Committee will be fair, impartial, and disinterested.

VII. Conflicts of Interest

USA Wrestling has instituted a Conflict of Interest Policy that requires that any conflicts of interest, whether actual or apparent, be reported promptly to USA Wrestling's General Counsel or the Ethics & Membership Committee. A copy of the Conflict of Interest Policy may be found on themat.com. You are subject to the Conflict of Interest Policy, including its mandatory reporting of conflicts. In addition, all USA Wrestling employees and Board members are required to complete an annual conflict of interest disclosure and certification.

A conflict of interest arises when you have an interest in, obligation to, or relationship with any business, property, or person that could affect your judgment in fulfilling your responsibilities to USA Wrestling. You are expected to refrain from any activity or investment that constitutes, or might appear to constitute, a conflict of interest. You are also required to disclose to the Ethics & Membership Committee any outside activity, relationship, or investment in which you are involved or may become involved that is, or has the potential for appearing to be, a conflict

of interest. If you require guidance in this area, your supervisor, or USA Wrestling's General Counsel should be consulted.

For example, you are not to have a material holding in, or a professional affiliation with, an organization or affiliate with which USA Wrestling does business or with which USA Wrestling competes, except as prescribed by USA Wrestling rules and policies and with the knowledge and approval of USA Wrestling's General Counsel and Chair of the Ethics & Membership Committee, who will consult with the full Ethics & Membership Committee as appropriate. You may not use your position at USA Wrestling to benefit yourself, your relatives, friends, or your private enterprises. A family or other personal relationship with a USA Wrestling member, vendor, or competitor also may present a conflict of interest. You must disclose to USA Wrestling's General Counsel any outside activity, relationship, or investment in which you are involved or may become involved that is, or has the potential for appearing to be, a conflict of interest. The General Counsel will consult with the Chair of the Ethics & Membership Committee and full Ethics & Membership Committee as appropriate. If you have any question about whether something may constitute a conflict, it is suggested that you seek guidance from your supervisor, the Chair of Ethics & Membership Committee, or USA Wrestling's General Counsel.

VIII. Business with or in Foreign Countries

Business conduct in foreign countries may sometimes differ from the United States, both in terms of common practice and legality. USA Wrestling requires that all business matters be conducted in an ethical and legal manner.

Gifts: The giving of gifts to, and receiving of gifts from, foreign nationals or representatives of foreign governments is governed by a complex set of US and foreign laws. Generally, the giving and receiving of such gifts is very limited or prohibited. Before offering a gift to a foreign national, you must receive the approval of USA Wrestling's General Counsel. In addition, if an exchange of gifts is both a legal and normal practice, the giving and receiving of such gift(s) will be subject to USA Wrestling's Gift & Entertainment Policy.

Payments: It is a felony under United States laws for USA Wrestling, any of its staff, or anyone acting on its behalf to give, offer, promise, or authorize a payment to a foreign official, foreign political party or official thereof, or any candidate for foreign political office, for the purpose of corruptly obtaining or retaining business for USA Wrestling. United States law also makes it a felony to pay money or anything of value to a commission agent, sales representative, or consultant when there is knowledge or firm belief that the payment will be used to corruptly influence a government official in connection with business USA Wrestling is attempting to obtain or retain. Political contributions will not be made by or on behalf of USA Wrestling in foreign countries. USA Wrestling will observe the laws of foreign countries in which it operates concerning payments of agents' fees and commissions, provided these laws are not in conflict with

United States law. You are not to engage in activities designated to circumvent foreign laws concerning retaining or paying sales representatives and consultants.

Export Control Laws: It is USA Wrestling's policy to comply with the export and reexport control rules and regulations under the Export Administration Regulations (EAR) administered by the United States Department of Commerce and the International Trade in Arms Regulations (ITAR) administered by the United States Department of State. You are not to engage in any export-related transaction on behalf of USA Wrestling which would violate these regulations.

IX. Business Relationships

It is imperative that all USA Wrestling, supplier, vendor, and other business relationships are managed in a fair, equitable, ethical, and legal manner consistent with the Code of Conduct, all applicable law and good business practices. Wherever practical, USA Wrestling provides a competitive opportunity for suppliers and vendors' business, and we enlist their active support in ensuring that we meet customer expectations regarding quality, cost, and delivery. Decisions to hire or engage a vendor or supplier should be made on the basis of objective criteria, and not on the basis of personal relationships, friendships, or the opportunity for personal gain, financial or otherwise. Prior to entering into a transaction or contract for a purchase or potential purchase that involves an actual or perceived conflict of interest, you should consult with USA Wrestling's General Counsel.

X. Personal Use of Organization Resources

It is the responsibility of each of you to protect and preserve USA Wrestling's resources. USA Wrestling resources include such things as company time, materials, supplies (including food), equipment (including vehicles), information, electronic mail and computer systems, facilities, and other property. These resources are provided to you to fulfill USA Wrestling's mission and work and are to be maintained and used for authorized USA Wrestling-related purposes only. The use of USA Wrestling resources for personal financial gain is strictly prohibited except where expressly authorized. You should consult the USA Wrestling Employee Handbook for further details. If you have a question about use of any USA Wrestling resources, you should contact your supervisor. You should report any improper use of USA Wrestling resources to your supervisor or USA Wrestling's General Counsel. USA Wrestling also has a Gift & Entertainment Policy that applies to giving and receiving any type of entertainment or gifts in connection with your work with USA Wrestling. The Gift & Entertainment Policy also covers gifts to U.S. state, and local government employees. You should consult the Gift & Entertainment Policy, and if necessary, obtain permission pursuant to the policy, before giving or receiving any entertainment or gifts. A copy of the Gift & Entertainment Policy may be found on themat.com.

XI. Political Activities and Contributions

USA Wrestling and its representatives comply with all federal, state, and local laws governing participation in government relations and political activities. Additionally, USA Wrestling funds or resources are not contributed to individual political campaigns, political parties, or other organizations that intend to use the funds primarily for political purposes. USA Wrestling also does not permit any political literature, campaign materials or politically orientated information, materials, posters, signs, or buttons to be displayed, circulated or otherwise present on USA Wrestling's property or in the course of conducting work for USA Wrestling. There are some very limited exceptions to this policy. At times, USA Wrestling may ask individuals to make personal contact with government officials or to write letters to present USA Wrestling's position on specific issues. Before doing so, you should confirm with USA Wrestling's General Counsel that such contact is authorized and in compliance with this policy, and that you are knowledgeable on the specific issues about which you have been asked to speak. You may, of course, participate in the political process on your own time and at your own expense, so long as you do not give the impression that you are speaking on behalf of or representing USA Wrestling in such activities. Nor can you be reimbursed by USA Wrestling for any personal contributions for such purposes. If you are seeking public office, you may use vacation time or request leaves of absence to campaign or hold office. USA Wrestling will not make contributions to any political candidate or party. This policy is required by the Ted Stevens Olympic and Amateur Sports Act, the Internal Revenue Code and other applicable law. You should contact USA Wrestling's General Counsel if you have any questions or concerns regarding these requirements.

XII. USA Wrestling Information

You are each responsible for the integrity and accuracy of organization documents, communications, and financial records. All financial information must reflect actual transactions and conform to generally accepted accounting principles. It is a violation of the Code of Conduct to alter or falsify information, including any record or document, to intentionally make a false or exaggerated statement or claim to anyone, or to mislead anyone. Anyone having concerns regarding questionable accounting or auditing matters should report their concerns to USA Wrestling's General Counsel or the Chair of the Ethics & Membership Committee, which will refer the matter to the Board of Directors' Audit Committee.

USA Wrestling's information assets are valuable to the organization, and it is USA Wrestling policy that all USA Wrestling representatives must diligently protect this information from loss, theft, inadvertent or unauthorized disclosure or misuse. It is essential that everyone do their part to protect USA Wrestling information, whether stored in computers, files or elsewhere. You must not discuss with or disclose to any unauthorized persons inside or outside the USA Wrestling any information that is confidential or not publicly available. USA Wrestling business should not be discussed with unauthorized persons. You should be careful about discussing USA Wrestling information and activities in the presence of, or within hearing distance of, unauthorized personnel. You should also not seek or accept any information to which you and

USA Wrestling are not legitimately entitled, regardless of the source. Your obligations to maintain the confidentiality and protection of USA Wrestling information does not end even if your employment or other relationship with USA Wrestling may end.

XIII. Intellectual Property

USA Wrestling protects the ownership of its intellectual property as set forth in the Employee Handbook. In addition, you should contact USA Wrestling's General Counsel regarding any anticipated use of intellectual property that does or may belong to someone else.

XIV. Contact Information

USA Wrestling General Counsel – Laura Peeters: lpeeters@usawrestling.org

Chair of the Ethics & Membership Committee: usawhearingpanel@gmail.com

Elite athletes who need confidential, independent advice or assistance in resolving a concern or dispute on any sport-related matter may contact the Office of the Athlete Ombuds: ombudsman@usathlete.org or 719/866-5000