



Conflict of Interest Policy

Policy Owner: COO, USA Badminton
Effective: 02/22/2023

Introduction

Those who choose to serve USA Badminton (USAB), whether as volunteers or paid professionals, are held to the highest standards of conduct. As guardians of the ideals of the sport of badminton, they assume an obligation to subordinate individual interests to the interests of the sport. What may be considered acceptable conduct in some businesses may be inappropriate in service to USAB.

Those who serve USAB must do so without personal gain, to avoid any institutional loss or embarrassment and to behave in such a way that the organization's trust and public confidence are enhanced. It is important to recognize and attempt to avoid any activity or investment that constitutes or might appear to constitute a conflict of interest.

While no set of guidelines can guarantee acceptable behavior, the principles, which guide behavior in this area, are disclosure, physical absence and nonparticipation in the decision making process where personal or family gain is a possibility and a commitment to honor the confidentiality of organizational information. All conduct is founded on the individual's own sense of integrity. Any individual accepting the honor of serving USAB must also accept the burdens of public disclosure and public scrutiny.

In our complex society, the intermix of volunteer work; business interests, governmental activity and family relationships often create potentially conflicting interests. What is required is disclosure of conflicting interests when they arise, as well as physical absence from and strict nonparticipation in any evaluation process relating to the matter in question.

The Conflict of Interest Policy ("Policy") does not attempt to provide an exhaustive list of every possible circumstance that might give rise to a conflict of interest, but provides examples of situations where potential conflicts of interest may or often arise.

Section 1. Applicability

This Policy applies to the following individuals ("Interested Party/ies"):

- a) Employees
- b) Board of Directors
- c) Officers
- d) Committee Members
- e) Advisory Group Members (i.e. technical officials, junior)
- f) Hearing Panel Members



- g) Volunteers (as designated as subject to this Policy by USAB)
- h) Contractors (as designated as subject to this Policy by USAB)

Note: Applicable to athlete representatives serving in one (or more) of the above-mentioned categories.

Section 2. Definition

USAB defines a Conflict of Interest as any situation in which an Interested Party (or the Interested Party's family member or close associate's activities) is in a position to derive, or be perceived to derive, personal benefit from actions or decisions made in their official capacity. Further, it is the existence of a personal or financial relationship with the Interested Party (and/or a family member or close associate) that could influence, or be perceived to influence, an Interested Party's objectivity when representing or conducting business for, or on behalf of, the USAB.

A Conflict of Interest also exists in the context of athlete or team selection when an Interested Party participates in a selection decision that involves or impacts an athlete with whom the Interested Party has a direct or indirect relationship. Or, when an Interested Party participates in a benefits or services allocation decision that directly impacts themselves.

For example, (1) an Athlete Representative serves on a committee hearing a team selection grievance wherein they were selected to be on the team in question or (2) an Interested Party benefits financially as part of a contract negotiation on behalf of USAB.

Section 3. Disclosure

3.01. Procedure for Disclosure

- a) **Annual Disclosure.** All Interested Parties must complete and file with the Ethics/Judicial Committee Chair the Conflict of Interest Disclosure Form (Attachment A) by January 31 on an annual basis. The disclosure form for the Ethics/Judicial Committee Chair must be filed with, and reviewed by, the Chair of the Board of Directors.
 - i. **Material Change.** In the event of a material change in circumstances and/or as new conflicts arise, an amended form must be completed and filed.
- b) **Verbal Disclosure.** In the event of a situation resulting in a real-time verbal disclosure, the CEO or COO should be consulted immediately and a Conflict of Interest Disclosure Form shall be completed and filed as defined in 3.01(a) as soon as possible thereafter.
- c) **Disclosure Review.** The Chair of the Ethics/Judicial Committee shall compile all Conflict of Interest Disclosure Forms annually, and as new forms are submitted, shall assess any conflict and determine whether the Interested Party with the conflict needs to refrain from participation or decision-making, or if any action is necessary to respond to, or mitigate, the conflict of interest. The same disclosure review will be conducted by the Chair of the Board of Directors for the Ethics/Judicial Committee Chair.



- d) **Information/Inquiries.** The Chair of the Ethics/Judicial Committee (and/or their designee) shall make inquiries, gather information, and/or facts as needed to ensure potential conflicts are adequately assessed.
- e) **Decision.** The Chair of the Ethics/Judicial Committee (or their designee) shall communicate acknowledgement of the disclosure, decision, and/or provide direction for managing conflict to the Interested Party via email. Likewise, the Chair of the Board of Directors will communicate via email to the Ethics Committee Chair.
- f) **Managing Conflict of Interest Acknowledgement.** The Conflict of Interest Disclosure Form shall serve as the Interested Party's acknowledgement that all directives for managing conflict will be followed as a condition of membership and/or USAB affiliation.
- g) **Board of Director and Committee Meeting Disclosures.** At the start of each USAB Board of Director Meeting and each USAB Committee Meeting, members must declare conflicts with any anticipated agenda item. These disclosures must be recorded in the minutes along with the associated recusal from the applicable agenda item. This requirement does not supersede the Annual Disclosure requirement outlined in 3.01(a).

3.02. Areas of High Risk

Pursuant to this Policy, all Conflicts of Interest must be disclosed. However, the following areas are deemed high risk and warrant specific attention.

- a) **Interested Parties Involved in the Creation or Enforcement of Selection Procedures.** Any Interested Party involved in the drafting, creation, or enforcement of selection procedures, including the athlete representative, who has a potential conflict of interest **must** disclose the potential conflicts pursuant to Section 3.01(a, b, g).

To ensure no Interested Party participating in the creation, drafting or enforcement of selection procedures has a conflict of interest, additional provisions are provided in the USAB Selection Procedures.

- b) **Interested Parties Empowered to Resolve Grievances.** Any Interested Party empowered to resolve grievances (e.g. Ethics Committee, Judicial Committee, or Hearing Panels) **must** disclose any potential conflicts pursuant to Section 3.01(a, b, g).

To ensure no Interested Party empowered to investigate potential violations and/or resolve grievances has a conflict of interest, additional protections are provided in the [USAB Grievance Procedures](#).

Section 4. Reporting

The USAB community has the right and responsibility to report alleged Violations of this Policy and USAB encourages the reporting of such allegations.

- a) **Process to Report.** Suspected violations shall be considered an Administrative Grievance and reported via the Notice of Grievance Form to both the Ethics/Judicial Committee Chair (ethicschair@usabadminton.org) and the USAB COO



(coo@usabadminton.org) consistent with the [USAB Grievance Procedures](#). Should the allegation be against the Ethics/Judicial Committee Chair or the USAB COO, the Notice of Grievance Form should be submitted directly to the USAB Board Chair (chair@usabadminton.org).

- b) **Applicable Policy Exception.** The Ethics/Judicial Committee Chair and the COO may redirect a report if, based on the matter reported, it is more appropriate to be addressed under a more applicable policy.

Section 5. Investigation, Resolution, and Enforcement

- a) **Investigate, Resolve and Enforce.** USAB takes its obligation to investigate, resolve and enforce potential violations of this Policy seriously. Alleged violations reported to USAB will be resolved pursuant to the [USAB Grievance Procedures](#).
- b) **Hearing.** USAB provides for an opportunity for a hearing pursuant to the [USAB Grievance Procedures](#).
- c) **Disinterested Parties.** Investigation, resolution, and enforcement will be executed by individuals who are unbiased, impartial, and free from conflicts of interests pursuant to the [USAB Grievance Procedures](#).

Section 6. No Retaliation

USAB will not encourage, allow, or tolerate attempts from any individual or group of individuals to retaliate, punish, allow or in any way harm any Interested Part(ies) who reports a concern in good faith. This applies to Interested Parties before, during, and after the process of resolving a conflict of interest matter. Such actions will be considered a violation of the [USAB Whistleblower and Anti-Retaliation Policy](#).

Section 7. Points of Contact

Interested Parties in need of further information, guidance, and/or enforcement in relation to this Policy may contact the following:

Ethics/Judicial Committee Chair
COO

Email: ethicschair@usabadminton.org
Email: coo@usabadminton.org

In addition, the USOPC Ethics & Compliance team can serve as a secondary resource for concerns regarding violations of this Policy. The USOPC Ethics & Compliance team may be contacted at:

Integrity Hotline: 877.404.9935
Integrity Portal: <https://usopc.ethicspoint.com>

For Athletes With Questions Regarding This Conflict of Interest Policy:

The Athlete Ombudsman provides cost-free, independent and confidential advice regarding athlete rights; resolving disputes or grievances; and any sport rule, policy, or process, including NGB-athlete agreements, codes of conduct or team selection procedures. The Athlete



Ombudsman can also help athletes connect with legal counsel or mental health resources if needed. Athletes may contact the Athlete Ombudsman at:

PHONE: (719) 866-5000

EMAIL: ombudsman@usathlete.org

WEBSITE: www.usathlete.org