

USOPC Compliant USBC Code of Conduct



Policy Owner: USBC Board of Directors

Purpose

To define the tenets by which the people who work on behalf of USBC shall conduct themselves consistent with the USBC's mission and core values.

Policy Statement

A. Introduction

The United States Bowling Congress ("USBC") services the needs of bowling. The USBC accomplishes this mission through its commitment to:

- Honesty, integrity, and trustworthiness in all dealings.
- Respect for the rights, differences, and dignity of others.
- Accountability and transparency.

The USBC has adopted this Code of Conduct to support these values and with the expectation the people who work, lead or volunteer on behalf of USBC conduct themselves consistent with USBC's mission and core values.

B. Applicable Individuals

This Code of Conduct applies to all employees, board members, directors, committee, hearing panel and task force members, independent contract workers, Team USA Coaches and volunteers of USBC.

C. Reporting Obligations

No code of conduct can address every situation, nor can it take the place of good judgment and integrity. USBC maintains an "open door" for anyone who has questions or concerns. USBC 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 the appropriate Reporting Individual as outlined in Item K. 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 the appropriate Reporting Individual.

If you choose to make your report to USBC's outside counsel, all communications will be treated with discretion and care. Callers may ask to remain anonymous.

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.

D. Whistle-Blower

Any applicable individual who reports, in good faith, a violation or potential violation of any policy is protected under USBC's Whistle-Blower Policy which is detailed in Article VI of the USBC Bylaws Due Process Supplement. USBC's Whistle-Blower Policy includes a No Retaliation statement.

E. Athlete Safety/Registered Volunteer Program

All applicable individuals are in roles within USBC which requires one to be a Registered Volunteer and must comply with all policies of USBC's Athlete Safety/Registered Volunteer program as detailed in the Athlete Safety/Registered Volunteer Handbook.

F. Conflict of Interest

USBC has instituted a Conflict of Interest Policy requiring any conflicts of interest, whether actual or apparent, be reported promptly. You are subject to the conflict of interest policy, including its



mandatory reporting of conflicts. In addition, all applicable individuals 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 USBC. You are required to disclose 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, USBC's outside counsel should be consulted.

For example, you should not have a material holding in an organization or affiliate with which USBC does business with or USBC competes. You may not use your position at USBC to benefit yourself, your relatives, friends or your private enterprises. A family or other personal relationship with a USBC member, vendor, or competitor also may present a conflict of interest.

You must disclose to the President or USBC's outside legal 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. If you have any question about whether something may constitute a conflict, it is suggested that you seek guidance from USBC's outside counsel.

G. Legal Compliance

USBC requires you follow the Code of Conduct and abide by all applicable USBC 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 USBC's outside counsel for further information and guidance.

H. Commitment to Integrity

USBC is committed to honesty and integrity as the cornerstone of our activities. In turn, USBC expects you to conduct yourself in an ethical and legal manner as a representative of USBC.

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, genetic information, veteran status, or any other characteristic protected under applicable federal, state, or local law.
- Know, understand and comply with all applicable laws, regulations and codes of conduct.
- Ensure that all USBC work and transactions are handled with honesty and recorded accurately.
- Protect information that belongs to USBC, our workers, volunteers, members and customers.
- Never use USBC assets or information for personal gain.
- Recognize even the appearance of misconduct or impropriety can be very damaging to the reputation of USBC and act accordingly.

USBC recognizes wagering on bowling, Olympic, Paralympic, and other USBC or USOPC events and on athletes where they are participating, for example Calcuttas may be 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 bowling and the Olympic movement that no person involved in the governance of USBC promote, support, or otherwise engage in wagering on bowling or Olympic Wagering. Thus you must at all times refrain from directly or indirectly:

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

Additionally, USBC finds sexual and physical abuse intolerable and in direct conflict with USBC ideals. USBC is committed to ensuring it and its employees, volunteers, board members, committee and task force members, promote an environment free from such abuse; and such commitment extends not only to the USBC's workplace, but also to the creation of safe sporting environments for athletes. To that end, the USBC forbids any form of sexual or physical abuse, whether in the workplace or outside it, and including instances involving athletes. You have a duty to report any alleged sexual or physical abuse occurring in the workplace or at any USBC supported training or sport activity to the US Center for SafeSport or USBC's Human Resources department in accordance with USBC's Athlete Safety Handbook.

I. Business Relationships

It is imperative all USBC, 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, the USBC 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 USBC outside legal counsel.

J. Personal Use of Organization Resources

It is the responsibility of each of you to protect and preserve the USBC's resources. USBC 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 the USBC's mission and work and are to be maintained and used for authorized USBC-related purposes. The use of USBC resources for personal financial gain is strictly prohibited except where expressly authorized. You should report any improper use of USBC resources to USBC's outside counsel.

K. Gifts

In the course of an employee's employment, including independent contractors, or a Board or committee member's tenure with the USBC, he or she may be offered a gift from an individual or company that does business with, or is interested in doing business with, USBC. Additionally, there may be situations where it is in USBC's interest for an employee or Board member to offer a gift or event invitation to a third party.

In addition to gifts and invitations received or given by USBC employees and Board or committee members, this policy applies to gifts and invitations received by the employee's or Board or committee member's spouses and immediate family members. The term "employee", "board" or "committee" covers spouses and immediate family.

When a policy covers all groups above, the term "USBC Team Member" will be used.

Anyone with questions or concerns about giving or receiving a gift or entertainment should discuss that concern or question with Director of HR, reporting director or USBC's General Counsel.

Receiving Business Courtesies

No employee will be permitted to receive gifts for personal or any other use, from vendors, business partners or other persons or entities that have or are seeking a business relationship with IBC entities. Gifts shall include gift certificates, services, travel, hotel stays, entertainment, or other perks and prizes.

Gifts may be accepted on behalf of the entire organization. These gifts will be used by the management for staff incentives or to recognize volunteer leaders.



Excluded from this prohibition is the exchange of normal business courtesies such as luncheons or dinners, when they are proper and consistent with regular business practices.

Failure to comply with the aforementioned provisions may result in corrective action, up to and including termination of employment.

USBC Board and Committee members may, receive gift/favor of only de minimis value. These gifts/favors should not compromise, in any way, the discussions and/or actions taken in regard to USBC. If you are unsure whether you may accept a gift/favor, or if you have any question whether it is de minimis, you should consult with USBC's outside legal counsel.

Anonymous Gifts – USBC Team Members cannot accept anonymous gifts which are sent to them in their official capacity. Anonymous gifts should be disclosed and given to the Executive Director.

Disclosure and Approval – USBC Team Members must disclose any and all gifts or invitations received in their capacity as an employee or representative of the USBC.

Extending Business Courtesies

There may be times when a USBC Team Member wishes to extend a gift or an invitation to attend a social event (e.g., reception, meal, sporting event, or theatrical event) to a Current or Prospective Business Partner to further or develop a business relationship.

In such instances, gifts may not exceed \$100 per person, per year, without the prior approval of the Executive Director.

USBC Team Members may give gift certificates within the limits set forth in this policy but may never give cash or financial instruments (e.g., checks, stocks) in any amount.

Policy Violations

Any USBC employee found to have violated this policy will be referred to HR and subject to appropriate disciplinary action, up to and including termination of employment.

Any USBC Board or Committee member found to have violated this policy will be referred to the USBC President and subject to appropriate disciplinary action, up to and including removal from the position.

If anyone is unsure of any of the requirements set forth in this policy or has questions regarding a specific situation related to gifts and entertainment, they should consult with their supervisor, HR or General Counsel.

Contact Information

HR: HR@bowl.com

General Counsel: sbeightol@michaelbest.com

L. Political Activities and Contributions

USBC and its representatives comply with all federal, state and local laws governing participation in government relations and political activities. Additionally, USBC funds or resources should not and will not be contributed to individual political campaigns, political parties, or other organizations that intend to use the funds primarily for political purposes. The USBC 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 USBC property or in the course of conducting work for USBC.

There are some very limited exceptions to this policy. At times, the USBC may ask individuals to make personal contact with government officials or to write letters to present the USBC's position on specific issues.

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 you are speaking on behalf of or representing USBC in such



activities. Nor can you be reimbursed by USBC for any personal contributions for such purposes. If you are seeking public office, USBC will not make contributions to any political candidate or party.

This policy is required by USBC bylaws, the Ted Stevens Olympic and Amateur Sports Act, the Internal Revenue Code and other applicable law. You should contact USBC's outside legal counsel if you have any questions or concerns regarding these requirements.

M. USBC Information

You are each responsible for the integrity and accuracy of USBC's documents, communications, member information, 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 the President or to USBC's outside legal counsel, who will refer the matter to the Board of Directors' Audit Committee.

USBC's information assets are valuable to the organization, and it is USBC policy all USBC 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 USBC information, whether stored in computers, files or elsewhere. You must not discuss with or disclose to any unauthorized persons inside or outside USBC any information that is confidential or not publicly available.

USBC business should not be discussed with unauthorized persons. You should be careful about discussing USBC information and activities in the presence of, or within hearing distance of, any third parties or unauthorized personnel. You should also not seek or accept any information to which you and the USBC are not legitimately entitled, regardless of the source.

Your obligations to maintain the confidentiality and protection of USBC information does not end even if your relationship with USBC may end.

N. Intellectual Property

USBC protects the ownership of its intellectual property. In addition, you should contact USBC's outside counsel regarding any anticipated use of intellectual property that does or may belong to someone else.

O. Reporting Individuals

Advice or assistance concerning the application of any aspect of this Code of Conduct or questions regarding a conflict of interest are to be reported to:

1. Employees – your supervisor, manager or Director of HR
2. Board, committee, task force or hearing panel members – USBC President or USBC's outside counsel. [Contact information: Scott Beightol of the Michael Best law firm – sbeightol@michaelbest.com]
3. Independent contract workers, Team USA Coaches and volunteers – USBC Executive Director or Director of HR

P. Resolution

Upon receipt of a potential code of conduct violation, the reporting individual will investigate the claim and make a determination on potential violations. An individual will have the opportunity for a hearing executed by a disinterested party for any determination which limits an individual's right to participate. The procedures in the USBC Bylaws Disciplinary Supplement will be followed.



I agree to the above Code of Conduct and understand any violation of this Code of Conduct could result in disciplinary action up to and including removal from the position I hold with USBC.

Date

Name (Please Print)

Signature



Conflicts of Interest

Conflict of Interest Form

As an Officer/Director/Committee Member of the United States Bowling Congress, I hereby certify that I am not in any way financially or personally interested in any business or other matter, other than as set forth in statements below, which would be incompatible with or tend to impair my independence of judgment in the performance of my duties.

1. Do you or any immediate family member:

- a. Have a business relationship or arrangement (whether formal or informal) with any person or entity which has any relationship, business or otherwise, with USBC. Yes No

Type of business

- b. Have a business or arrangement (whether formal or informal) with any bowling proprietor or any entity or person which may be affected by USBC actions or rulemaking. Yes No

Type of business

- c. Have a business relationship or arrangement (whether formal or informal) with USBC or any organization affiliated with USBC (other than your position as Director/Committee Member).
Yes No

Type of business

2. Are you an owner, investor or otherwise financially interested in or a beneficiary of any entity which has a relationship of the type described in items 1 a, b, or c. Yes No

3. List all bowling sponsorships you or any immediate family are contracted with (whether formal or informal) and date contract expires.

Not Applicable

4. List all current positions on a USBC local or state board and date term ends.

Date

Name (Please Print)

Signature



Confidentiality Agreement

CONFIDENTIAL INFORMATION means information, to the extent it is not a Trade Secret, which relates to or encompasses USBC's existing or potential activities, strategies, plans, methods of operation, business (including all financial information) and technology, or member information, which information is generally not known to the public and which USBC seeks to protect from disclosure. It includes information in all forms including oral, written or electronic including all information contained or stored in computers and discs.

TRADE SECRET means unpublished information or inventions of USBC (such as ideas, improvements and discoveries), works of authorship (such as computer programs or systems and literary, pictorial, graphic and audio-visual work whether published or not and in whatever form) and know how developed or possessed by USBC which has independent economic value from not being generally known and not being readily ascertainable by proper means by others and is subject to efforts to maintain its secrecy.

Except as required in the conduct of my activities on behalf of USBC or as expressly authorized in writing, I shall not use or disclose, directly or indirectly,

- 1) any Confidential Information (a) during the period of my affiliation with USBC; and (b) for a period of two years following termination of all affiliations with USBC in any geographic area in which such use or disclosure could harm the interests of USBC; and
- 2) any Trade Secret of the USBC as long as such Trade Secret remains, without misappropriation, a Trade Secret.

I recognize and agree that the above restrictions include a prohibition on the use of Confidential Information or Trade Secrets to advance my personal or business interests or those of my family or affiliates.

Date

Name (Please Print)

Signature

