



USA ARCHERY CONFLICT OF INTEREST POLICY

Updated: April 2024

SECTION 1. POLICY STATEMENT

USA Archery (USAA) is committed to sustaining an ethical workplace free of conflicts of interest and perceived conflicts of interest. Each Decision Maker (as defined below) has the responsibility to administer the affairs of **USAA** honestly and prudently, and to exercise their best care, skill, and judgment for the sole benefit of **USAA**. Those persons shall exercise the utmost good faith in all transactions involved in their duties, and they shall not use their positions with **USAA** or knowledge gained therefrom for their personal benefit. The interests of the organization must be the first priority in all decisions and actions. **USAA** requires that any of its Decision Makers recognize and attempt to avoid any activity or investment that involve, might appear to involve, or could result in a potential conflict of interest.

This 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, transactions, (a **“transaction”** is any contract, transaction, agreement or relationship involving the sale or purchase of goods, services, or rights of any kind, the providing or receipt of a grant or loan, or the establishment of any other financial relationship with **USAA**) where potential conflict of interest often arise.

SECTION 2. PERSONS CONCERNED

This Conflict of Interest Policy is applicable to all **USAA** Decision Makers. **“Decision Makers”** include, but are not limited to, members of **USAA**’s Board of Directors (the Board of **USAA**), officers, designated committee members, selection committees, task force members, hearing panel members, employees, volunteers, independent contractors, and competition juries.

SECTION 3. DEFINITIONS

A **“Conflict of Interest”** or **“Conflict”** exists when a Decision Maker’s activities, interests, or relationships interfere with, influence, or have the potential to interfere with or influence their responsibilities on behalf of **USAA** or undermine the interests of the **USAA**. The activities and interests of a Decision Maker’s relatives and close associates

must also be considered when evaluating whether a conflict of interest exists. Relatives and close associates (RCAs) include spouses/domestic partners, children, siblings, parents, in-laws, close friends, and business partners.

A “**Conflict of Interest**” can exist in the context of athlete or team selection when a Decision Maker participates in a selection decision that involves or impacts an athlete who is an RCA of the Decision Maker or when a Decision Maker participates in a benefits or services allocation decision that directly impacts the Decision Maker or their RCAs.

As defined below, a conflict of interest may be actual, potential, or perceived:

i. Actual Conflict of Interest

An actual conflict of interest exists when a Decision Maker has an active relationship with a person or organization that may influence their decision making in their role with **USAA**.

ii. Potential Conflict of Interest

A potential conflict of interest exists when an actual conflict of interest has not yet been established, but there is reasonable cause to believe that a future event may create a conflict of interest. An example of a potential conflict of interest is a Decision Maker that has an active relationship with a person or organization that is under consideration for a vendor contract with **USAA**. By contrast, if the vendor relationship is established, the Decision Maker would have an actual conflict of interest related to this vendor.

iii. Perceived Conflict of Interest

A perceived conflict of interest exists when a Decision Maker does not have an active relationship with a person or organization, but it may appear to another individual that a connection between the two exists and has influenced a decision made by the Decision Maker. A perceived conflict of interest may also exist if a Decision Maker has disclosed a conflict of interest and has recused themselves from decision making but takes actions that make it appear that they were involved in the decision (e.g., the conflicted person recused themselves from a discussion about a particular decision but remained in the room while the discussion was ongoing). It is important to remember that perceived conflicts of interest are often seen by others as actual conflicts of interests.

SECTION 4. AREAS IN WHICH CONFLICTS MAY ARISE

Conflicts of interest may arise in the relations of Decision Makers with any of the following third parties: (1) Persons and firms supplying goods and services to **USAA**; (2) Persons and firms from whom **USAA** leases property or equipment; (3) Persons and entities with whom **USAA** is dealing or planning to deal in connection with the gift, purchase or sale of real estate, securities or other property; (4) Competing or affinity organizations; (5) Donors and others supporting **USAA**; (6) Agencies, organizations, and associations which affect the operations of **USAA**; or (7) RCAs and other employees of **USAA**.

Potential conflicts of interest often arise when Decision Makers have an interest, directly or indirectly, with any persons or entities mentioned above. Examples of potential conflicts of interest are listed below. This list below is not intended to be an all-inclusive list of every instance that may create a potential conflict of interest, but rather, is simply a sample of types of relationships and activities that may give rise to a conflict of interest. If a Decision Maker or other disclosing individual has any question as to whether a relationship or activity may create a conflict of interest, a disclosure must be made.

Examples of potential conflicts of interest that should be disclosed are listed below.

1. A Decision Maker has personal relationships with other Decision Makers who they regularly work alongside or who their work affects.

EXAMPLE: Two **USAA** board members who are serving at the same time are married.

EXAMPLE: A **USAA** board member is the parent of a current national team athlete.

2. A Decision Maker or RCA owns stock or holds debt or other proprietary interests in any third party dealing who may potentially deal with **USAA**.

EXAMPLE: A **USAA** board member owns a 70% interest in a company seeking to enter into a contract with **USAA** to provide consulting services.

3. A Decision Maker or RCA owns a business, maintains a second job, or provides goods or services under a provider, contractor, or consulting agreement, where by the outside business provides goods or services to **USAA**, the USOPC, or any other NGB.

EXAMPLE: **USAA** is contemplating entering into an agreement with a HR consulting company owned by a **USAA** employee's husband.

4. A Decision Maker or RCA holds a position of executive, officer or director, participates in the management of, or is otherwise employed (or formerly employed) with any third party dealing with **USAA**.

EXAMPLE: A **USAA** board member is the CEO of a technology company negotiating a contract with **USAA** to provide IT services.

5. A Decision Maker or RCA receives remuneration for services with respect to individual transactions involving **USAA**.

EXAMPLE: A **USAA** board member gets paid a commission if **USAA** enters into a particular contract with a third party.

6. A Decision Maker uses **USAA's** time, personnel, equipment, supplies, information or data (including member data), assets, resources or goodwill for anything other than **USAA**-approved activities, programs, and purposes.

EXAMPLE: A **USAA** employee uses a **USAA** vehicle for a personal road trip.

7. A Decision Maker solicits gifts or gratuities using their **USAA** role or accepts personal gifts, loans, gratuities, or discounts from third parties, including situations that may or may not constitute a violation of **USAA's** Gift & Entertainment Policy. No personal gift of money should ever be accepted.

EXAMPLE: When a company trying to obtain a contract to provide services to **USAA** provides a \$100 gift certificate to a **USAA** board member who would be voting on whether **USAA** should execute the contract in question.

EXAMPLE: Asking for box seats or field of play access to a sporting event because of your position on **USAA's** board of directors.

EXAMPLE: Accepting tickets to an NFL game worth \$250 from a business seeking to obtain a contract to provide landscaping services for **USAA** headquarters.

8. A Decision Maker or RCA acts as an agent, representative, or consultant to a business whose interests may conflict with the interests of **USAA**.

EXAMPLE: A **USAA** board member agrees to promote another NGB in negotiations with potential sponsors of licensees.

EXAMPLE: A spouse of a **USAA** board member works for or is an investor in a company that competes with **USAA** or that provides services to a company that competes with **USAA**.

9. A Decision Maker or RCA has a business relationship with a sponsor, supplier, licensee, or vendor of **USAA**.

EXAMPLE: A **USAA** employee's spouse provides legal services to one of **USAA's** sponsors.

10. A Decision Maker awards **USAA** business to, or provide favorable treatment to, a business owned or controlled by a volunteer or an RCA.

EXAMPLE: USAA is contemplating entering into a contract for landscaping services with a company because the landscaping company is owned by an employee's brother.

11. A Decision Maker engages in activities or maintains interests and relationships, whether direct or indirect, that interfere with or influence, or have the potential to interfere with or influence, the satisfactory performance of a Decision Maker's responsibilities on behalf of **USAA** or undermine the interests of **USAA**.

EXAMPLE: A **USAA** board member has a significant client who owns or operates a facility being considered as the host of a **USAA** event.

EXAMPLE: A Decision Maker serves on a hearing panel or appeal panel involving discipline against a member of the Decision Maker's club / team / family.

EXAMPLE: An athlete is the potential recipient of benefits or services that are being allocated by **USAA** and participates in the allocation decision.

12. A Decision Maker drafts selection procedures or participates and/or votes within a selection committee of **USAA** when they have a relationship with an athlete who is potentially impacted by the selection procedures (e.g. as coach, trainer, parent, etc.) or when a Decision Maker might benefit directly or indirectly from the selection method.

EXAMPLE: The athlete representative assisting with drafting, voting on, and/or signing the procedures is also competing for a spot on the team for which the procedures are written.

SECTION 5. INTERPRETATION OF THIS CONFLICT OF INTEREST POLICY

The examples listed in Section 4 are not exhaustive. Decision Makers should disclose all relationships and activities which may give rise to a potential conflict of interest, whether or not listed expressly in Section 4.

Disclosure of a conflict or potential conflict of interest does not necessarily prohibit involvement in the disclosed activity or with USAA. For example, the conflict might not be material enough to be of practical importance, or if it is material, it might be possible for the USAA and Decision Maker to implement appropriate mitigating measures upon full disclosure of all relevant facts and circumstances. However, it is USAA's policy that the existence of any of the interests described or similar in nature to those described in Section 4 will be disclosed before any transaction is consummated or any vote taken on an action, contract, relationship, or decision that would give rise to the potential conflict of interest. It is the continuing responsibility of each Decision Maker to scrutinize their transactions, outside business interests, and relationships for potential conflicts and to immediately make such disclosures.

SECTION 6. CONFLICT DISCLOSURE STATEMENTS

All Decision Makers must comply with the Conflicts of Interest Policy and proactively disclose actual or potential conflicts of interest as they arise.

In addition, all members of the following groups of Decision Makers must annually sign and submit to the Ethics Committee and **USAA's** CEO a standardized disclosure form to disclose any actual or potential conflicts of interest:

- **USAA** Employees
- Board members and officers
- Committee members
- Volunteers and contractors with substantial decision-making authority

Hearing panel and task force members are also required to complete a conflicts disclosure prior to beginning their duties.

Any new **USAA** employee will submit a conflict of interest disclosure statement within 14 days of their hiring by **USAA** to fulfill the annual disclosure requirement. Any other new Decision Maker who is required to submit an annual disclosure will submit a conflict of interest disclosure statement by the earlier of 14 days after his or her appointment or their first board, committee, or task force meeting to fulfill the annual disclosure requirement. In no event will a Decision Maker participate in any decisions to commit **USAA** to a proposed transaction or in athlete or team selection procedures prior to submission of their conflict of interest disclosure statement.

Any actual or potential conflict of interest must be disclosed. Each conflicts disclosure will be reviewed and addressed by the Ethics Committee as outlined in Section 8.

USAA will maintain copies of all disclosures submitted in accordance with the document retention policies and procedures.

SECTION 7. PERIODIC STATEMENTS AND UPDATES

Each Decision Maker shall annually sign and submit a new conflict of interest disclosure form, using the form attached hereto, by February 1st which affirms such person:

1. Has received a copy of the conflicts of interest policy;
2. Has read and understands the policy;
3. Has agreed to comply with the policy, and
4. Understands that **USAA** is a charitable organization and in order to maintain its federal tax exemption it must engage primarily in activities which accomplish one or more of its tax-exempt purposes. Each annual disclosure shall be reviewed and addressed by the Ethics Committee.

USAA shall maintain copies of all disclosure forms submitted for a period of four (4) years.

In addition to the required annual disclosures, each employee, board member or officer, committee member, and volunteer or contractor with substantial decision-making authority will submit to the Ethics Committee an updated disclosure describing any new potential conflicts of interest or material changes to a previously disclosed conflict of interest as they arise. **USAA** will maintain copies of all periodic statements or updates submitted in accordance with the document retention policies and procedures.

Board and committee members must also review meeting agendas before each meeting to determine if, for any discussion item, they have any potential conflicts of interest that should be disclosed under this policy. At the beginning of each meeting, each board or committee member should state the agenda items for which he or she has such a potential conflict of interest. When those agenda items are addressed by the board or committee, the conflicted board or committee member may need to recuse themselves for discussions and/or board or committee votes. Board and committee members who become aware of a conflict mid-discussion, such as during a conversation that evolves to include content that presents a conflict that was not apparent from the agenda item's title, should recuse themselves at that time.

Recusal means the board or committee member must leave the meeting entirely and return only when the discussion or vote on the agenda item is completed. The minutes should reflect each disclosure and recusal.

SECTION 8. PROCEDURES FOR REVIEWING AND MANAGING POTENTIAL CONFLICTS OF INTEREST

a) Review of Disclosures

The **USAA** Ethics Committee, or their designee, collects and reviews conflict of interest disclosures, documents any actual or potential conflicts of interest, and determines any actions required to manage the conflict of interest. Conflict of interest disclosures for the CEO and Board of Directors are provided to the Ethics Committee for review. With regard to employees (except the CEO) and independent contractors, conflict of interest forms may be reviewed by the Ethics Committee designee, the appropriate direct supervisor. The direct supervisor will review the forms to determine if any conflict exists. If no conflict of interest, they will sign and date the form. If there is a conflict, they will escalate the issue to the Ethics Committee Chair. The supervisor will return all completed forms to **USAA** for safekeeping.

Conflicts will be addressed as follows:

- i. The Ethics Committee, or designee, as applicable, will review the information provided by the Decision Maker in their disclosure, requesting additional information from the Decision Maker if necessary to fully understand the nature of the conflict.
- ii. The Ethics Committee, or designee as applicable, will determine whether an actual or apparent conflict of interest exists.
- iii. If the Ethics Committee, or their designee, as applicable, determines that an actual or apparent conflict of interest exists, they will determine whether there are mitigating measures that can be implemented to alleviate the conflict and/or what steps the interested individual and/or **USAA** must take or not take in order to avoid the conflict.

The disclosure of an actual or potential conflict of interest will not necessarily prohibit involvement in the disclosed activity or with **USAA**. Rather, each disclosure will be reviewed individually, and actions may be recommended to protect the Decision Maker, **USAA**, and the integrity of the decisions made by the Decision Maker and **USAA** from actual, potential, and perceived conflicts of interests. These actions may include limitation of involvement, separation from certain **USAA** activities, or requests to cease the activity in question.

- iv. All direction for managing conflicts will be discussed with the Decision Maker directly. If a material conflict is identified (whether actual or potential) for the CEO, board member, or Designated Committee (as defined by the USOPC Bylaws) member, the Ethics Committee must communicate, in writing, its direction on conflict management to the individual.

b) With Respect to Proposed USAA Transactions or Business

In the event a potential conflict of interest exists with respect to a proposed transaction or arrangement, then promptly and before any decision is made regarding the proposed transaction or arrangement, the potential conflict of interest will be addressed as follows:

- i. The interested person may make a presentation to the Ethics Committee, which may be convened virtually, regarding the transaction or arrangement involving the potential conflict of interest.
- ii. The interested person will then recuse themselves from any and all discussion and approval (if applicable) of the conflict of interest.
- iii. The Ethics Committee will determine whether an actual or apparent conflict of interest exists. For transactions, the Ethics Committee may consider whether a competitive bid or competitive evaluation exists.
- iv. If the Ethics Committee determines that an actual or apparent conflict of interest exists, it will determine whether there are mitigating measures that can be implemented to alleviate the conflict and/or what steps the interested individual and/or **USAA** must take or not take in order to avoid the

conflict. The Ethics Committee may determine in some cases that **USAA** cannot engage in the transaction or arrangement at all due to the conflict or potential conflict of interest.

c) With Respect to Drafting Selection Procedures and Athlete/Team Discretionary Selection

The following disclosure requirements and procedures apply in the context of drafting selection procedures and athlete/team discretionary selection decisions in order to ensure that no Decision Maker participating in the process has a conflict of interest that will impact their ability to make a fair and unbiased decision in the athlete or team selection process.

Any Decision Maker involved in the drafting of procedures, including the athlete representative, or on a discretionary selection committee who has a potential conflict of interest must disclose it to the Ethics Committee for review. The following process will be followed:

- i. The Interested Person may make a presentation to the Ethics Committee, which may be convened virtually, regarding the potential conflict of interest.
- ii. The interested person will then recuse themselves from any and all discussion regarding the potential conflict of interest.
- iii. The Ethics Committee will determine whether an actual or apparent conflict of interest exists
- iv. If the Ethics Committee determines that a conflict of interest exists, it will either mandate the individual's recusal from the process or determine to what extent, if any, that individual can participate in the process the Ethics Committee may determine that the individual can still participate in the drafting of the procedures or be included in the discussions for discretionary selection of a team, but not take part in any sign-off, vote, or decision. For example, a national team coach or USAA staff member may provide information to the selection committee so long as such information is provided in a fair and unbiased manner and the committee member who disclosed the conflict of interest does not vote toward the final decision.
- v. Under no circumstances will a person with an actual or potential conflict attempt to unduly influence other members of the committee in the selection process.

If the Decision Maker is recused and a vacancy on the committee exists, either in the drafting process or on the discretionary selection committee, **USAA** will use its best reasonable efforts to fill that vacancy. If a vacancy results in the athlete representative position, another athlete representative who meets the qualifications for that committee will be appointed and approved by a representative group of athletes.

d) With Respect to Seating Hearing Panels

The following disclosure requirements and procedures apply in the context of seating hearing panels in order to ensure that no Decision Maker participating in the process has a conflict of interest that will impact their ability to make a fair and unbiased decision in the hearing process to resolve a grievance.

Any Decision Maker appointed to a hearing panel, including the athlete representative, is obligated to disclose all actual or potential conflicts of interest prior to being appointed to a hearing panel. The Ethics Committee will solicit and review potential panel members' disclosures and make a determination on whether they are a disinterested party for the matter under review.

Hearing panel appointments are subject to an objection from either the complaining party or responding party on the grounds of a conflict of interest which is believed to be disqualifying. Objections will be handled using the following process:

- i. The objecting party may report the alleged conflict of interest to the Ethics Committee in the [reasonable time period] following the parties' notification of hearing panel appointment.
- ii. The Ethics Committee will review the objecting party's report and, taking all investigative steps necessary, determine whether an actual or potential conflict of interest exists.
- iii. If the Ethics Committee determines that an actual or potential conflict of interest exists, the hearing panel member will be disqualified and a new hearing panel member will be appointed to replace the disqualified hearing panel member. The replacement hearing panel member shall be required to

complete all disclosure requirements and is similarly subject to challenge by the parties as outlined in this section.

SECTION 9. REPORTING VIOLATIONS OF THE CONFLICTS OF INTEREST POLICY

Any individual with a good faith belief that a Decision Maker has a conflict of interest may notify the Ethics Committee of such perceived conflict by emailing ethics@usarchery.org. Furthermore, should any Decision Maker become aware of any undisclosed conflict of interest, or any conflict of interest not fully disclosed, they should make full disclosure of their knowledge of the potential conflict of interest involved to the Ethics Committee by emailing ethics@usarchery.org. Reports may be made anonymously, if desired.

All good faith reports of violations of this policy are protected under the provisions of the USAA Whistleblower Policy. USAA has zero tolerance for retaliation against an individual for filing a good faith report of a violation or potential violation. Consult the USAA Whistleblower Policy for additional information.

SECTION 10. VIOLATIONS OF THE CONFLICTS OF INTEREST POLICY

If the Ethics Committee has reasonable cause to believe a Decision Maker has failed to disclose an actual or potential conflict of interest, it will promptly inform the Decision Maker of the basis for such belief and afford the member an opportunity to explain the alleged failure to disclose.

If, after hearing the Decision Maker's response and after making further investigation as warranted by the circumstances, the Ethics Committee determines the Decision Maker has failed to disclose the conflict or potential conflict of interest, it will take appropriate disciplinary and corrective action. The Ethics Committee will communicate all such decisions in writing to the Decision Maker. The Ethics Committee's decision will be final.

In the event that a member of the Ethics Committee is not disinterested in a particular alleged violation under review, that member shall recuse themselves from the investigation and decision-making process. In all cases, matters under review shall be reviewed by disinterested parties.

While any such failure to disclose a conflict or potential conflict of interest is under investigation by the Ethics Committee, the Decision Maker will be precluded from engaging in further decisions of **USAA** that bear any relation whatsoever to the matter that is the subject of the conflict or potential conflict of interest.

The minutes of the Ethics Committee meetings shall contain:

1. The names of the persons who disclosed or otherwise were found to have a connection with an actual, potential, or perceived conflict of interest, the nature of the conflict of interest, any action taken to determine whether a conflict of interest was present, and the Ethics Committee's decision as to whether a conflict of interest in fact existed; and
2. The names of the persons who were present for discussions and votes relating to the transaction or arrangement, or selection process, the content of the discussion (including, but not limited to, an analysis of the fairness and reasonableness of the transaction or arrangement in question, or the fairness of having the individual participate in the selection process), including any alternatives to the proposed transaction or arrangement, and a record of any votes taken in connection with the proceedings.

SECTION 11. FALSE AND MALICIOUS ACCUSATIONS:

Any person who makes a false or malicious allegation of a violation of this policy (as opposed to allegations made in good faith, even if erroneous) will be subject to disciplinary action.

SECTION 12. FURTHER INFORMATION

USAA is responsible for this policy and its enforcement. USAA can be contacted with any questions about this policy by emailing athletesafety@usarchery.org.

For questions regarding or reporting under this Conflict of Interest Policy please contact the Chairman of the **USAA** Ethics Committee at ethics@usarchery.org and/or the **USAA** CEO at ceo@usarchery.org.

For Athletes With Questions Regarding This Conflict of Interest Policy:

Team USA athletes may contact the Athlete Ombuds for independent and confidential advice on a variety of sport related matters, including their rights, applicable rules, policies or processes, and questions related to resolving disputes and grievances. The Athlete Ombuds can also help Team USA athletes connect with legal counsel or mental health resources if needed. All other USAA athletes (i.e., athletes competing domestically at the masters or youth level, recreational athletes, foreign athletes), are welcome to visit the Athlete Ombuds website to review informational resources and should work directly with USAA to understand additional resources and options available to them.

PHONE: (719) 866-5000

EMAIL: ombudsman@usathlete.org

WEBSITE: www.usathlete.org



CONFLICT OF INTEREST DISCLOSURE FORM

Disclosure Statement

I, _____, am a member of USAA and/or currently serve USAA in the following manner(s) (please select all that apply):

- Board of Directors
- Committee Member
 - Please specify which committee(s) _____
- Task Force Member
 - Please specify which task force(s) _____
- Hearing Panel Member
 - Please specify which hearing panel(s) _____
- Employee
- Volunteer
- Selection Committee
- Athlete Representative
- Contractor
 - Coach
 - Official
 - Judge
 - ITS Staff
 - State Coordinator
 - Other _____

Attestation

I attest to the following:

- I have received the USAA Conflict of Interest Policy (the "Policy").
- I have read and understand the Policy.
- I agree to comply with the Policy.
- I understand that USAA is a charitable organization and to maintain its federal tax exemption it must engage primarily in activities which accomplish one or more of its tax-exempt purposes.

Affiliated Person Definition

Affiliated persons include your family and other people or organizations close to you. Affiliated persons can include:

- Your spouse, domestic partner, child, mother, father, brother, sister, grandparent, cousin or other blood relative;
- Any corporation or organization of which you are a board member, an officer, a partner, participate in management or are employed by, or are, directly or indirectly, a debt holder or beneficial owner of any class of equity securities; and
- Any trust or other estate in which you have a substantial beneficial interest or as to which you serve as a trustee or in a similar capacity.

Sport and Community Involvement

- I own, operate or work at a business that is involved in our sport
If yes, what is the name of the business:
- My family members or **affiliated persons** own, operate or work in a business that is involved in our sport
If yes, what is the name of the business:
- I am actively participating in our sport as a competitor, official, coach or other type of participant
- My family member(s) or **affiliated person(s)** actively participate in our sport as a competitor, official, or other type of participant.

Detailed Declarations

1. Have you or any of your affiliated persons **provided** any of the following services or property to USAA in the last 12 months?

(Includes a business you or an affiliated person own, an employer you or an affiliated person maintain, or any third party in which you or an affiliated person are associated with)

- Yes
 - No
 - N/A
-
- Coach certification courses
 - Judge certification courses
 - Individual membership
 - Club membership
 - Equipment
 - Independent Contractor Services (Coaching, Judging, Para Classifier, State Coordinator, Sport Performance Services, etc)

- Other Services or Property

If yes to any of the above, please describe the nature of services or property, and, if an affiliated person is/was involved, the identity of the affiliated person and your relationship to that person:

2. Have you or any of your affiliated persons **purchased** any of the following services or property from USAA in the past 12 months?

- Yes
- No
- N/A

- Coach certification courses
- Judge certification courses
- Individual membership
- Club membership
- Equipment
- Other Services or Property _____

If yes to any of the above, please describe the purchased services or property, and, if an affiliated person is/was involved, the identity of the affiliated person and your relationship to that person:

3. Please indicate whether you or any of your affiliated persons had any direct or indirect financial interest in any business transactions to which USAA was or is a related party within the last 12 months?

- Yes
- No
- N/A

- Gifts (To include Value-in-Kind)
- Favors

- Ownership
- Investment
- Negotiations
- Vendor
- Compensation or Financial Gain from Non-USAA Sources

If yes, please describe the transaction, and, if an affiliated person is/was involved, the identity of the affiliated person and your relationship to that person:

3. Please indicate whether you or any of your affiliated persons hold office, serve on a board, participate in management, are otherwise employed (or formerly employed), serve as a representative, agent, and/or consultant with a third party dealing with USAA:

(Includes any involvement with NAAF, NFAA, S3DA, ASA, IBO, Hoyt, Easton, other vendors, etc...)

- Yes
 - No
 - N/A
-
- Office
 - Board Service
 - Management
 - Employment
 - Representative
 - Agent
 - Consultant

If yes, please provide more information on who held office, served on a board, participated in management, or was otherwise employed with a third party dealing with USAA.

4. Were you or any of your affiliated persons indebted to pay money to USAA at any time in the past 12 months (other than pre-approved travel advances)?

- Yes
- No
- N/A

Loans

Cash Advances

Restitution

If yes, please describe the indebtedness, and, if an affiliated person is/was involved, the identity of the affiliated person and your relationship to that person:

5. In the past year, did you or any of your affiliated persons receive, or become entitled to receive, directly or indirectly, any of the following as a result of your relationship with USAA:

- Yes
- No
- N/A

Discounts

Grants/ Travel Provisions

Prize Money

Stipends

Equipment

Donations

Sponsorship

Non-USAA Sources (If you are aware that the other entity also does business with USAA)

If yes to any of the above, please describe the benefit(s), and, if an affiliated person is/was involved, the identity of the affiliated person and your relationship to that person:

If yes to any of the above, was the aggregate total value in excess of \$1,000?

- Yes
- No
- N/A

6. Are you or any of your affiliated persons a party to or do you or your affiliated persons have an interest in any pending legal proceedings involving USAA?

- Yes
- No
- N/A

If yes, please describe the proceeding(s), and, if an affiliated person is/was involved, the identity of the affiliated person and your relationship to that person:

7. If you are on an athlete /staff selection committee or on the Board of Directors and are influential in policies that govern selection procedures, do any of the following apply:

- Yes
- No
- N/A

- Is there an affiliated person who is competing or intends to compete for a spot on a team?
- Are you an athlete competing or intends to compete for a spot on a team?
- Do you coach an athlete who is competing for a spot or intends to compete for a spot on a team?
- Do you have an immediate family member, employee, or colleague who is otherwise participating in the competition for which the selection committee has been or may be convened?
- Are you a coach, contractor, volunteer, or ITS Staff Member who is being considered or intends to be in consideration for a staff position?

If yes to any of the above, please describe the identity of the affiliated person, athlete, or person involved in or impacted by the selection proceedings in question, and your relationship to that person:

8. Do you have a pre-existing personal relationship with any the following:

- Yes
- No
- N/A

- USAA Employee
- Board Member
- Committee Member
- Task Force Member
- Hearing Panel Member
- Volunteer
- Contractor
- ITS Staff Member
- Athlete Representative

If yes, please identify the relationship and describe the nature of the relationship.

9. OTHER

Is there any other relevant relationship or matter not disclosed or asked about above, which might be **perceived** to compromise your obligations to USAA under USAA's Code of Ethics?

- Yes
- No
- N/A

Is there any other relevant relationship or matter not disclosed or asked about above, which may raise questions of a conflict between your duty and loyalty to USAA and your self-interest?

- Yes
- No
- N/A

Are you aware of any other events, transactions, arrangements or other situations that have occurred or may occur in the future that you believe should be and/or would prefer be examined by USAA's Ethics Committee in accordance with the terms and intent of USAA's Conflict of Interest Policy?

- Yes
- No
- N/A

If yes to any of the above, please describe the situation(s), the reason for which you believe that this situation may give rise to a conflict of interest, and, if an affiliated person is/was involved, the identity of the affiliated person and your relationship to that person:

I HERBY CONFIRM that my responses to the above questions are complete and correct to the best of my information and belief. I agree that if I become aware of any information that might indicate that this disclosure is inaccurate or that I have not complied with this policy, I will notify the Ethics Committee immediately.

Name (Print): _____

Signature: _____

Date: _____

FOR USA ARCHERY USE ONLY:

- Reviewed- No Conflicts Noted
- Reviewed - Conflicts addressed and mitigated in the following manner:

Reviewed by (Name Printed): _____

Date: _____

Signature: _____