



USA Hockey Leadership Code of Conduct
For National USA Hockey Volunteers and Staff
(with Gift and Entertainment Policy)

This Code of Conduct applies to members of the Board of Directors ("Board") and the Congress ("Congress"), Officers, Staff, Council, Committee and Section members, task force members, hearing panel members and any other national level volunteers of USA Hockey. This Code of Conduct is in addition to the USA Hockey Code of Conduct that applies to all USA Hockey members. By accepting a position as a member of the Board or Congress, an Officer, Staff or national-level volunteer, an individual agrees to comply with and be subject to this Code of Conduct. This Code of Conduct should be read in conjunction with the USA Hockey Annual Guide ("Annual Guide"). As it pertains to USA Hockey Staff, this Code of Conduct should also be read in conjunction with the USA Hockey Employee Guidelines ("Employee Manual").

Vision

The vision of USA Hockey is to be the recognized leader for all who seek a fun, safe and rewarding ice hockey experience.

Mission

The mission of USA Hockey is to promote a safe and fun learning experience supporting the growth of the sport and all its participants and enthusiasts by encouraging, educating, developing and administering all aspects of the sport.

Build Trust and Credibility

The success of USA Hockey is dependent on the trust and confidence we earn from members, volunteers and staff. We gain credibility by adhering to commitments, displaying honesty and integrity and reaching USA Hockey goals through honorable conduct. It is easy to *say* what we must do, but the proof is in our *actions*. When considering any action, ask the following questions:

- Will this build trust and credibility for USA Hockey?
- Will it help create a working environment in which USA Hockey can succeed over the long term?
- Is the commitment we are making one in which we can follow through?

The only way we can maximize trust and credibility is by answering "Yes" to each of those questions and by working diligently every day to enhance the sport of hockey.

Respect for the Individual; Nondiscrimination

We all deserve to work in an environment where we are treated with dignity and respect. USA Hockey is committed to creating such an environment because it brings out the full potential in each of us, which, in turn, contributes directly to our professional success. We cannot afford to let anyone's talents go to waste.

USA Hockey is an equal opportunity employer and is committed to providing a workplace that is free from harassment and discrimination. Any employee who feels harassed or discriminated against should report the incident to his or her manager or to Human Resources, as further described in the Employee Manual.

Create a Culture of Open and Honest Communication

At USA Hockey, everyone should feel comfortable speaking his or her mind, particularly with respect to ethical concerns. Managers have a responsibility to create an open and supportive

environment where employees feel comfortable raising such questions. We all benefit when employees exercise their power to prevent mistakes or wrongdoing by asking the right questions at the right times.

A “whistleblower,” as defined in USA Hockey’s Whistleblower Policy, includes a Covered Individual who reports an activity that he or she considers to be addressed by this Policy. When an issue is raised, USA Hockey will investigate and take action according to its Whistleblower Policy, which describes USA Hockey’s policy, reporting procedures, and protections for reporting individuals. See <https://www.usahockey.com/annualguide> for more details.

SafeSport

The safety of its participants is of paramount importance to USA Hockey. This includes not only on-ice safety, but also off-ice safety in any part of USA Hockey’s programs.

USA Hockey has **ZERO TOLERANCE** for abuse and misconduct.

USA Hockey Safe Sport is a program focused on the organization’s off-ice safety efforts. In order to ensure a safe and welcoming environment, all members of the Board, Officers, Staff and Volunteers are required to uphold the policies of the USA Hockey Safe Sport Program (see www.usahockey.com/safesportprogram and the USA Hockey Safe Sport Handbook), including any requirements of the U.S. Center for SafeSport (see www.uscenterforsafesport.org). Additionally, if you become aware of a violation, or potential violation, of SafeSport policies, you are obligated to report the situation as described under USA Hockey’s and the Center for SafeSport’s requirements. If you are not sure whether a particular circumstance follows SafeSport guidelines, please see our General Counsel.

Set Tone at the Top

USA Hockey’s leaders have the added responsibility of demonstrating, through their actions, the importance of this Code of Conduct. In any business, ethical behavior does not simply happen; it is the product of clear and direct communication of behavioral expectations, modeled from the top and demonstrated by example. Ultimately, our actions matter. Leaders should not consider identification of ethics concerns as threats or challenges to their authority, but rather as another encouraged form of business communication. At USA Hockey, we want ethics dialogue to become a natural part of daily work.

Uphold the Law

USA Hockey’s commitment to integrity begins with complying with the laws, rules, and regulations of the locations where we do business, as well as the Ted Stevens Olympic and Amateur Sports Act. Further, each of us must have an understanding of the local laws, industry rules and regulations, and the USA Hockey policies that apply to our specific roles. If you are unsure of whether a contemplated action is permitted by law or USA Hockey policy, seek the advice from General Counsel or Human Resources.

Third-Party Proprietary Information

It is important that we respect the property rights of others. We will not seek to acquire by improper means a competitor’s trade secrets or other proprietary or confidential information. We will not engage in unauthorized use, copying, distribution or alteration of software, or other third-party intellectual property.

USA Hockey Confidential Information

Board members, Congress Representatives, Officers, Staff, or National-Level volunteers will obtain confidential information of USA Hockey. The disclosure of such confidential information might be adverse to the interests of USA Hockey, therefore each individual must exercise care

not to disclose confidential information acquired in connection with such status. Additionally, such individuals may not use confidential information of USA Hockey for their personal gain. All such individuals are subject to USA Hockey's Nondisclosure Policy located in the Annual Guide, the Employment Manual (Staff), and any other specific nondisclosure arrangements an individual may have with USA Hockey (including nondisclosure agreements that an individual may execute from time to time for the protection of USA Hockey). Individuals should be particularly vigilant when making presentations or proposals to outside third parties not to disclose or use USA Hockey's confidential information. See <https://www.usahockey.com/annualguide> for more details.

Conflicts of Interest

Conflicts of interest have the potential to cause legal problems as well as embarrassment for USA Hockey. While conflicts of interest are not expressly prohibited, they must be duly considered by an appropriate body or party of USA Hockey, based on disclosures as required by USA Hockey.

Conflicts of interest exist where an individual's activities or relationships present the potential for improper personal gain or advantage, or an adverse effect on the interests of USA Hockey. Members of the Board and Congress, Officers, Staff, and National-Level volunteers must avoid conflicts of interest. Examples of conflicts of interest and USA Hockey's Conflicts of Interest Policy are located in the Annual Guide. The policy is intended to help individuals identify situations that present possible conflicts of interest and to provide USA Hockey with procedures whereby potential conflicts may be reviewed by an appropriate body or party of USA Hockey.

See <https://www.usahockey.com/annualguide> for more details.

Determining whether a conflict of interest exists is not always easy to do. Individuals with a conflict of interest question should first consult the USA Hockey Conflict of Interest Policy and may seek advice from General Counsel or the Chair of the Ethics Committee. Staff should also refer to the Employment Manual and may seek advice from Human Resources or executive leadership.

Gifts, Gratuities and Conflicts of Interest

a. Receipt of Business Courtesies or Gifts.

Gifts, gratuities and business courtesies present potential for conflicts of interest by Staff or other USA Hockey representatives. USA Hockey is committed to competing solely on the merit of our services. Staff and other USA Hockey representatives (and their immediate family members) should avoid any actions that create a perception that favorable treatment of outside entities by USA Hockey was sought, received or given in exchange for personal business courtesies. Members of the Board and Congress, Officers, Staff, Council, Committee and Section members, task force members, hearing panel members and any other national level volunteers, and their immediate family members, may accept occasional meals, refreshments, entertainment and similar business courtesies that are shared with the person who has offered to pay for the meal or entertainment, or unsolicited gifts (e.g., flowers or fruit baskets that commemorate a special occasion, items of logoed clothing, etc.) or sporting or event tickets not of excessive value, provided that:

- They are not inappropriately lavish or excessive.
- The courtesies are not frequent and do not reflect a pattern of frequent acceptance of courtesies from the same person or entity.
- The courtesy does not create the appearance of an attempt to influence business decisions, such as accepting courtesies or entertainment from a supplier whose contract is expiring in the near future.
- The individual accepting the business courtesy would not feel uncomfortable discussing the courtesy with his or her manager or having the courtesies known by the public.

Independent contractors of USA Hockey (e.g., national team coaches and staff, national camp instructors, etc.) shall be required to comply with these provisions on Gifts, Gratuities and Conflicts of Interest through their written agreement with USA Hockey.

b. Offering Business Courtesies or Gifts.

Any Members of the Board or Congress, Officers, Staff, Council, Committee and Section members, task force members, hearing panel members and any other national level volunteers, and their immediate family members, who *offer* a business courtesy must assure that it cannot reasonably be interpreted as an attempt to gain an unfair business advantage or otherwise reflect negatively upon USA Hockey. An individual may never use personal funds or resources to do something that cannot be done with USA Hockey resources. Accounting for business courtesies must be done in accordance with approved USA Hockey procedures.

Other than to certain government or non-profit partners, for whom special rules apply, USA Hockey may provide nonmonetary gifts (e.g., USA Hockey logo apparel or similar promotional items) to our current or prospective business partners. Further, Executive Management may approve other courtesies, including meals, refreshments, event tickets, or entertainment of reasonable value, provided that:

- The practice does not violate any law or regulation or the standards of conduct of the recipient's organization.
- The business courtesy is consistent with industry practice, is infrequent in nature and is not lavish.
- The business courtesy is properly reflected on the books and records of USA Hockey.

c. Disclosure and Approval

Persons subject to this Policy must promptly disclose any gifts or invitations prohibited by this Policy that are received in their capacity as an employee or representative of USA Hockey to the Executive Director or General Counsel. Where the gift or invitation is made to the Executive Director or General Counsel, the requisite disclosure must be made the Ethics Committee.

Prior to accepting invitations or gifts that include travel and/or overnight accommodations, written approval must be received from the Executive Director or General Counsel. In the case of the General Counsel's or CEO's request for approval, such approval must be received from the Ethics Committee.

Executive Director: patk@usahockey.org

General Counsel: cjorgensen@usahockey.org

Ethics Chair: ethicschair@usahockey.org

The Ethics Committee or the Executive Director/General Counsel may, in consultation with the applicable individual, require that any gift(s) be surrendered and donated to USA Hockey or another agreed-upon charity if the Ethics Committee or Executive Director/General Counsel believe that such gift(s) is not proper and/or creates an appearance of impropriety.

If an individual 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 contact the Executive Director or General Counsel.

d. Violations of Policy.

Violations of this Policy may be reported to USA Hockey by the processes outlined in the USA Hockey Whistleblower Policy. Violations will be referred to Executive Director, General Counsel or Ethics Committee, as appropriate, and subject to appropriate disciplinary action.

Accurate Public Disclosures

We will make certain that all USA Hockey disclosures made in financial reports and public documents are full, fair, accurate, timely and understandable. This obligation applies to all Staff, including all financial staff, with any responsibility for the preparation for such reports, including drafting, reviewing and signing or certifying the information contained therein. No business goal of any kind is ever an excuse for misrepresenting facts or falsifying records.

Employees should inform executive leadership and Human Resources if they learn that information in any filing or public communication was untrue or misleading at the time it was made or if subsequent information would affect a similar future filing or public communication.

Corporate Recordkeeping

We will create, retain and dispose of any USA Hockey records as part of our normal course of business in compliance with all USA Hockey policies and guidelines, as well as all regulatory and legal requirements.

All corporate records should be true, accurate and complete, and USA Hockey data must be promptly and accurately entered in our books in accordance with USA Hockey's applicable accounting principles and other policies.

We must not improperly influence, manipulate or mislead any unauthorized audit, nor interfere with any auditor engaged to perform an internal independent audit of USA Hockey books, records, processes or internal controls.

Promote Substance over Form

At times, we may be faced with decisions we would rather not have to make and issues we would prefer to avoid hoping, that if we avoid confronting the issue, it will simply go away.

At USA Hockey, we must have the courage to tackle tough decisions and make difficult choices, secure in the knowledge that USA Hockey is committed to doing the right thing. At times this may mean doing more than what the law requires. Merely because we *can* pursue a course of action does not mean we *should*.

Although USA Hockey's guiding principles cannot address every issue or provide answers to every dilemma, this Code of Conduct can define the spirit in which we intend to do business and should guide us in our daily conduct.

Accountability

We are responsible for knowing and adhering to the values and standards set forth in this Code of Conduct and for raising questions if we are uncertain about an USA Hockey policy. If we are concerned whether the Code of Conduct's standards are being met or are aware of violations of this Code of Conduct, we must contact Human Resources, the General Counsel or the chair of the USA Hockey Ethics Committee.

USA Hockey takes seriously the standards set forth in this Code, and violations are cause for disciplinary action up to and including termination of an individual's position.

Use of USA Hockey Resources

USA Hockey resources, including time, material, equipment and information, or travel for USA Hockey business, are provided for USA Hockey business use. Nonetheless, occasional personal use is permissible as long as it comports with the provisions of the Employee Handbook (Staff) and does not affect job performance or cause a disruption to the workplace.

Individuals who represent USA Hockey are trusted to behave responsibly and use good judgment

to conserve USA Hockey resources. All individuals are responsible for the proper use of USA Hockey resources assigned to them in accordance with USA Hockey policies and the Employee Handbook (Staff). Improper use of USA Hockey equipment, such as computers, copiers and fax machines, includes use for an outside business or in support of any religious, political or other outside daily activity, except for USA Hockey-requested support to nonprofit organizations. We will not solicit contributions nor distribute non-work-related materials during work hours.

In order to protect the interests of the USA Hockey network and fellow employees, USA Hockey reserves the right to monitor or review (i) all data and information contained on an employee's USA Hockey-issued computer or other electronic devices and (ii) the use of the Internet or USA Hockey's Intranet. The use of USA Hockey resources to create, access, store, print, solicit or send any materials that are harassing, threatening, abusive, sexually explicit or otherwise offensive or inappropriate will not be tolerated.

Questions about the proper use of USA Hockey resources should be directed to the appropriate chain of command, which may include Council, Committee, or Section leaders or your Staff management.

Review of Alleged Violations of this Code of Conduct

A review of any alleged violation of this Code of Conduct by any members of the Board or Congress, Officers, or other national-level volunteers shall be within the jurisdiction of the Ethics Committee. A review of a staff member's violation of the Code of Conduct shall be addressed by the Executive Director.

All members of the Board or Congress, Officers, other national-level volunteers, and employees shall have a duty to cooperate with any investigation or resolution under this Code of Conduct. A failure to cooperate may in itself be a violation of this Code of Conduct. The Ethics Committee shall report any alleged breach of the duty to cooperate to the Board of Directors.

Do the Right Thing

Several key questions can help identify situations that may be unethical, inappropriate or illegal. We should ask ourselves:

- Does what I am doing comply with the USA Hockey guiding principles, Code of Conduct and other USA Hockey policies?
- Have I been asked to misrepresent information or deviate from normal operating procedure?
- Would I feel comfortable describing my decision at a staff meeting?
- Am I being loyal to my team, USA Hockey and myself?
- Is this the right thing to do?

Information and Resources:

Pat Kelleher (Executive Director)
Casey Jorgensen (General Counsel)
Amber Rayfield (Director of Human Resources)
Mike Trimboli (President)

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