Department	Original Date	Responsible to
Human Resources	7/19/2022	President and CEO
Subject	**Revision Date**	**Page**
Conflict of Interest Policy for the Lakeshore Foundation National Adapted Sport Organization (LNASO)	7/13/2025	1 of 5

This policy and procedure rescind any previous material covering this subject matter.

I. PURPOSE

The purpose of this policy is to outline the guidelines for identifying conflicts of interest for the Lakeshore Foundation National Adapted Sport Organization (LNASO).

II. SCOPE

The LNASO will take all reasonable steps to avoid conflicts, or the appearance of conflicts, between our private interests and our official responsibilities and performance of our duties.

This policy applies to all employees, Board members, officers, contractors, committee members, task force members, hearing panel members and volunteers who conduct business on behalf of and with the LNASO.

III. POLICY

A conflict of interest exists when the personal or professional interests of an employee, Board member, contractor, or volunteer affects his or her ability to be objective. Each of these individuals has the responsibility of placing the interests of the LNASO first in any dealings on behalf of the organization.

Any employee, Board member, contractor, or volunteer of the LNASO who gains privileged information by virtue of his or her role with the LNASO shall not use that privileged information for personal gain. Additionally, if an employee, Board member, contractor, or volunteer has an interest in another organization's proposed financial transaction with the LNASO, he or she must make full disclosure of such interest to the President and CEO or the Chief Operating and Financial Officer prior to any discussion or negotiation of such transaction.

The LNASO will not have any association or connection with another organization that might result in any conflict with the purposes, aims or goals of the LNASO. Further, The LNASO will only conduct business with individuals and companies on the basis of The LNASO's best interests.

An actual or potential conflict of interest occurs when an employee, Board member, contractor, or volunteer of the LNASO is in a position to influence, or benefit financially or in any other way from, a business decision by the LNASO that may result in a personal gain for the employee, Board member, contractor, or volunteer or for a relative of an employee, Board member, contractor, or volunteer. For the purpose of this policy, a relative is any person who is related by blood or marriage, or whose relationship with the employee, Board member, contractor, or volunteer is similar to that of persons who are related by blood or marriage.

The LNASO, which is being formed as a nonprofit, tax-exempt organization, depends on charitable contributions from the public. Maintenance of its tax-exempt status is important both for its continued financial stability and for the continued receipt of contributions and public support. Therefore, the IRS as well as state corporate and tax officials, view the operations as a public trust which is subject to scrutiny by, and accountability to, such governmental authorities as well as to members of the public.

Consequently, there exists between the LNASO and employees, Board members, contractors, or volunteers a fiduciary duty, which carries with it a broad duty of loyalty and fidelity. The employee, Board member, contractor, or volunteer have the responsibility of administering the affairs of the LNASO honestly and prudently, and of exercising reasonable care, skill, and judgment for the sole benefit of the LNASO. Employees, Board members, contractors, or volunteers shall exercise the utmost good faith in all transactions involving them, and they shall not use their positions with the LNASO, or knowledge gained therefrom, for their personal benefit.

IV. MATERIAL CONFLICT OF INTEREST DEFINED

A material conflict of interest is defined as an interest, direct or indirect, of an employee, Board member, contractor, or volunteer with any person or firm doing business with or considering doing business with the LNASO. Such an interest might arise through the following**:**

1. Serving as an Officer of another NGB
2. Family member activities
3. Conflicts that arise due to an athlete's activities or relationships
4. Owning stock or holding debt or other proprietary interests in any third party dealing with the LNASO.
5. Holding office, serving on the board, participating in management, or being otherwise employed by any third party dealing with the LNASO.
6. Receiving remuneration, directly or indirectly, for services with respect to individual transactions involving the LNASO.
7. Using the LNASO's time, personnel, equipment, supplies, or good will for other than LNASO approved activities, programs, and purposes.
8. Receiving personal gifts or loans from third parties dealing with the LNASO. Receipt of any gift is disapproved except gifts of nominal value which could not be refused without discourtesy. No personal gift of money should be accepted.

V. DISCLOSURE AND APPROVAL

Individuals including all employees, Board members and officers, committee members, and volunteers with substantial decision-making authority, e.g., hearing panel members, and competition juries at NGB events. shall disclose annually potential conflicts of interest according to the standards set forth below. If a material change occurs between the annual disclosure, the conflict shall be disclosed.

All disclosure forms are required to be reviewed annually and decisions about potential conflicts must be communicated in writing. Disclosure should be made in writing annually to the Chief Operating and Financial Officer who shall determine if a conflict exists and is material; if he or she is the one with the conflict, then disclosure should be made to the President and CEO who shall determine if a conflict exists and is material. If the matter involves the CEO, the disclosure should be made to the Chair of the LNASO Board who shall determine if a conflict exists and is material. All disclosure forms completed by members of the Board and those completed by the CEO are reviewed by the Board of the LNASO who shall determine if a conflict exists and is material. Board disclosures should also be made at Board meetings where potential conflicts of interest are documented in the Board

meeting minutes.

If an actual, potential, or perceived conflict is identified for a board member, Designated Committee member, or the CEO/ED, the designated reviewer must communicate direction on conflict mitigation to the individual in writing.

Transactions involving potential conflict of interest may be undertaken only if all the following are observed:

1. All material components of the transaction are fully disclosed.
2. The individual with the potential conflict is excluded from the discussion and approval of such transaction;
3. The price of the work is no higher than market value; and
4. The Chief Operating and Financial Officer has determined that the transaction is in the best interest of the organization.

The decision of the Chief Operating and Financial Officer on these matters will rest in its sole discretion, and its concern shall be the welfare of The LNASO and the advancement of its purpose.

VI. ATHLETE SELECTION

The LNASO Conflict of Interest Policy is applicable to athlete selections. Any member of a Selection Committee that has a possible conflict of interest must disclose it to the Chief Program Officer. If such conflict exists, the selection committee member must recuse him/herself from committee discussions and voting. Further, the committee member should not otherwise influence other members of the committee in the selection process. However, a committee member who recused him/herself, but who has relevant and necessary information with respect to athlete performance, for example a national team coach or high performance manager, may, if requested by the selection committee, provide such information to the committee so long as such information is provided in a fair and unbiased manner and the committee member who declared the conflict of interest does not vote toward the final decision.

VII. PANELS EMPOWERED TO RESOLVE GRIEVANCES

Any member of the hearing panel empowered to resolve grievances that has a possible conflict of interest must disclose it. The chair of the hearing panel will determine if a conflict is material/exists If such conflict exists, the hearing panel member will be removed and an additional panel member will be named. If the chair of the hearing panel has a conflict, then the CEO shall determine if a conflict is material/exists. If such conflict exists, then the CEO shall name appoint a new chair of the hearing panel. Individual members of any panel must complete separate disclosure forms.

VIII. REPORTS OF VIOLATIONS

Reports of violations of the Conflict of Interest policy will be made to Chief Executive Officer. ***Retaliation against any individual who reports, in good faith, wrongful conduct and/or participates in the investigation is prohibited.***

The CEO shall appoint a hearing panel consisting of three (3) individuals to hear the complaint. At least one member of the hearing panel shall be an athlete. The Chief Executive Officer shall also appoint a chair of the hearing panel from among the three individuals appointed. The Hearing Panel shall be responsible to ensure that all complaints are heard in a timely, fair, and impartial manner.

In the event that a complaint is filed against the CEO, The LNASO Board Chair shall appoint and convene a hearing panel that is free from a conflict of interest.

The hearing panel will investigate and determine if the individual has failed to disclose the conflict, potential conflicts of interest or has violated the policy in any other way and will take appropriate disciplinary and corrective action. The hearing panel's decision will be final and will be communicated in writing

While any such failure to disclose a conflict, potential conflict of interest, or other violation of the policy is under review by the hearing panel, the individual will be precluded from engaging in further decisions of the LNASO that bear any relation whatsoever to the matter that is the subject of the conflict or potential conflict of interest.

Fair notice of charges, requested remedy and opportunity for a hearing will be provided to any athlete coach, staff member, administrator or official in writing prior to declaring an individual ineligible.

Questions regarding the Conflict of Interest Policy should be directed to the Chief Operating Officer at cathym@lakeshore.org.

Athlete questions can be directed to the Athlete Ombudsman Office. The Athlete Ombuds Office provides cost-free, independent, and confidential advice regarding athlete rights, grievance procedures and any other related guidance pertaining to selection procedures and can assist in mediating disputes between athletes and their NGB.

To contact the Athlete Ombuds Office: PHONE: (719) 866-5000
EMAIL: ombudsman@usathlete.org WEBSITE: www.usathlete.org

Reports and Questions may also be filed through the USOPC Integrity Portal. The portal is an online reporting platform that allows individuals to confidentially or anonymously report concerns

to the USOPC.

Anyone may report a concern through the Integrity Portal relating to the USOPC's or NGBs' compliance with their bylaws, policies, or procedures, or the Ted Stevens Olympic and Amateur Sports Act; ethics matters such as conflicts of interest; and governance matters concerning the USOPC or NGBs.

To report a concern: WEBSITE:
https://secure.ethicspoint.com/domain/media/en/gui/53006/index.html

PHONE: 877-404-9935