



**UNITED STATES EQUESTRIAN FEDERATION, INC.**  
**CODE OF ETHICS AND CONFLICT OF INTEREST POLICY**  
**(Attachment L)**

**Introduction**

As the guardians of the sport of equestrian in the United States, and because we operate in the public spotlight, we are expected to conduct our affairs on a basis consistent with the great trust that has been placed in us. This requires our behavior to conform to the highest ethical principles. See Bylaw 343 regarding Conflict and Duality of Interest. For these reasons, the United States Equestrian Federation, Inc. ("USEF") requires its volunteers and staff to conduct business with integrity, to maintain a standard of ethical conduct consistent with the regulations of all countries and jurisdictions in which USEF conducts business and to be guided by the knowledge that we are guardians of equestrian sport and must maintain the values, spirit, and ideals with the sport and its part in the Olympic movement. Furthermore, because the appearance of impropriety can be just as damaging as actual impropriety, conduct, which appears to be improper, is also unacceptable. (See definitions below.) Accordingly, volunteers, and staff are required to comply with the following USEF Code of Ethics when representing or participating in USEF activities, selection processes, or events:

1. Conduct all dealings with honesty and fairness.
2. Respect the rights of all employees to fair treatment and equal opportunity, free from discrimination or harassment of any type.
3. Know, understand and comply with the laws, regulations, and codes of conduct governing the conduct of USEF competitions and business - both domestic and foreign.
4. Ensure that all transactions are handled honestly and recorded accurately.
5. Protect information that belongs to USEF, our donors, sponsors, suppliers and fellow workers.
6. Avoid conflicts of interest, both real and perceived.
7. Never use USEF assets or information for personal gain.
8. Recognize that even the appearance of misconduct or impropriety can be very damaging to the reputation of the USEF and act accordingly.

**Conflicts of Interest**

These principles provide a framework of integrity for interactions with or on behalf of USEF. However, given the unique makeup of the USEF family, more in depth questions may arise regarding conflicts of interest. For this reason the following guidance is provided:

•USEF defines a conflict of interest as any personal or financial (both direct and indirect) relationship including relationships of family members (see definition below) that could influence or be perceived to influence your objectivity when representing or conducting business for, or on behalf of USEF, or participating in a USEF selection process.

•USEF defines "family" for these purposes as follows: spouse, parent, child or spouse of a child, brother, sister, spouse of a brother or sister, a cohabiting companion, or any other individual with a significant familial or familial-like relationship.

•USEF defines a substantial appearance of a conflict of interest as whenever others may reasonably infer from the circumstances that a conflict exists. Because the appearance of impropriety can be just as damaging as actual impropriety, conduct that appears to be improper must be disclosed so that the appropriate USEF entity may determine whether such substantial appearance of a conflict is deemed to be a prohibited conflict of interest. For these reasons, an individual must recuse himself/herself from participating in the USEF activity giving rise to the substantial appearance of a conflict of interest unless and until it is determined by the appropriate USEF entity that no conflict exists.

•Every year by the time of the annual meeting in January, each USEF Board member, IHP Committee member, Hearing Committee member, Budget and Finance Committee member, Audit Committee member, Ethics Committee member, Licensed Officials committee member, member of any other committee involved in selection processes, and

employee, must fulfill his/her obligation to disclose any conflict by submitting the appropriate form attached (A, and B or C) to the CEO.

•In accordance with Bylaw 343, this Policy also covers the selection of athletes, horses, coaches, trainers, managers, administrators, veterinarians, officials and others for competitions.

For example if (1) personal or financial interests exist with any person or concern with whom the USEF has a business or other relationship or you have a personal or financial relationship with a applicant for a team or individual chosen by a selection process or a substantial appearance of a conflict of interest exists (see definition above) and (2) the other relationship or interest could influence or be perceived to influence the objectivity of your decisions, you must:

1. Disclose the interest to the Chief Executive Officer, who shall have the authority to either (a) approve the relationship if with respect to an employee, or (b) refer the matter to a three-member Subcommittee of the USEF Executive Committee for its consideration; and
2. Excuse yourself from any formal or informal discussions related to the relationship between USEF and the person or concern unless and until notified by the CEO or Subcommittee that the relationship has been approved; and
3. Abstain from voting and from seeking to influence the vote on any matter related to the person or concern if the relationship is not approved.

Inappropriate hospitality or gift giving between individuals can also create a conflict of interest.

•USEF defines inappropriate hospitality as the offering or receiving of accommodations, tours, event tickets, entertainment, meals or other similar personal benefits except as specifically provided for by applicable policies.

Similarly, USEF prohibits the receipt or giving of personal gifts except for items of nominal value such as coffee mugs, hats, pins, etc. unless specifically provided for by applicable policies.

Questions regarding the application of USEF's hospitality and gift policies must be addressed to the Chief Executive Officer.

#### **Enforcement**

Any person who violates or condones the violation of the Code of Ethics is subject to disciplinary measures, which may include termination of membership, employment, and expulsion from the board, working group, committee, or task force. The Chief Executive Officer shall review all violations of the

Code of Ethics and, if appropriate, (a) as to volunteers refer the matter to the Hearing Committee for determination of what, if any disciplinary action should be taken or (b) as to staff, sanction the individual in accordance with USEF's standard employment practices.

This code serves as a framework for ethical conduct but does not cover every situation. If you are unclear about the requirements of this code, please consult your supervisor or contact the Chief Executive Officer at USEF as follows:

United States Equestrian Federation, Inc.  
4047 Iron Works Parkway  
Lexington, Kentucky 40511  
Telephone: 859/225-6920 (FAX: 859/231-7371)

**EXHIBIT A**

**UNITED STATES EQUESTRIAN FEDERATION, INC.**

**DISCLOSURE AND AFFIRMATION STATEMENT**

*PLEASE RETURN THIS DISCLOSURE AND AFFIRMATION STATEMENT TO THE UNITED STATES EQUESTRIAN FEDERATION, INC., ATTENTION EXECUTIVE OFFICE, AT YOUR EARLIEST CONVENIENCE.*

**Disclosure**

I have read carefully and fully understand the attached Conflict of Interest Policy of the United States Equestrian Federation, Inc. (USEF).

I am aware that if, because of any relationships, positions, or circumstances, concerning me within the last twelve (12) months, I may have or appear to have a potential conflict of interest, I am required to list such relationships, positions, or circumstances on the annexed Exhibit B and, if applicable, C as the case may be, and to return the appropriate completed Exhibit(s) with this Disclosure and Affirmation Statement.

I understand that, if I have any question in my mind whether I may have a potential conflict of interest, I should disclose that interest to USEF on the annexed Exhibit B and, if applicable, C. Any questions concerning USEF's Conflict of Interest Policy shall be referred to the Executive Director of USEF for referral to the appropriate reviewing body.

**Affirmation**

I hereby affirm that I have received a copy of the Code of Ethics and Conflict of Interest Policy of the United States Equestrian Federation, Inc. that is in effect as of the date hereof (the "Policy"), that I have read and understand the Policy, and that I agree to comply with the Policy. I further understand the duty to list all individuals, businesses and/or other entities that create or represent a potential conflict of interest on Exhibit B and, if applicable, C and to promptly update and amend Exhibit B and, if applicable, C should any amendment be necessary.

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Signature

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Print Name

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Date

**EXHIBIT B**

**UNITED STATES EQUESTRIAN FEDERATION, INC.**

**CONFLICT OF INTEREST DISCLOSURE STATEMENT**

**For all but Selection Matters**

This statement must be completed by every USEF Officer, Executive Committee Member, Board Member, Hearing Committee member, Budget and Finance Committee member, Audit Committee member, Ethics Committee member, and Licensed Officials Committee member. This Disclosure Statement shall be submitted annually and updated as often as necessary to USEF. Providing the information requested herein is a prerequisite to participation by Directors and Committee members. Refusal to provide the requested information or providing incomplete or inaccurate information may result in removal from office or Board membership or committee membership.

1. If you or any member of your immediate family is an officer, partner, director, trustee, owner or employee of any person or any entity which does business with USEF, please list the name and address of the entity(ies) and the nature of your relationship with said person or entity(ies), and describe the dealings. If none, please state "none."

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2. If you or any member of your immediate family holds an ownership interest in a closely-held company or other business entity, or at least a five (5%) percent ownership interest in any public company which does business with USEF, please list the name and address of the entity(ies), the nature of your relationship with said person or entity(ies) and describe the dealings. If none, please state "none."

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3. If you have any reason to believe that any of the persons or entities with which you or immediate members of your family are affiliated may have business dealings with USEF in the future, please list those entities and the nature of such dealings. If none, please state "none."

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4. Are you an employee or employer of another USEF Director or do you have any other business dealings or financial dealings with another USEF Director or any company or concern with which that Director is involved?

\_\_\_\_\_ Yes                      \_\_\_\_\_ No

If you have answered yes to the above, please provide the details as follows.

If you or any member of your immediate family is an officer, partner, trustee, owner or part- or full-time employee (contractual or otherwise) of a Director of USEF or the entity owned or in which said Director has at least a five (5%) percent ownership interest, please list the name and address of the Director, the nature of your relationship with said Director(s) and describe the dealings. If none, please state "none."

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5. If there is any relationship or matter not disclosed above which might be perceived to compromise your obligations to USEF under its Conflict of Interest Policy or which may raise questions of a conflict between your duty and loyalty to USEF, your loyalty to any other entity and/or your economic self-interest, please indicate here what that relationship or matter is. If none, please state "none."

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6. Are you an officer, director or employee of any other amateur sports organization that is recognized as a national governing body by the United States Olympic Committee? If not, please state "no."

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\_\_\_\_\_  
Signature

\_\_\_\_\_  
Print Name

\_\_\_\_\_  
Date

**EXHIBIT C**

**UNITED STATES EQUESTRIAN FEDERATION, INC.**

**CONFLICT OF INTEREST DISCLOSURE STATEMENT FOR SELECTIONS**

**This form is to be completed by all members of the International High Performance Committees and all members of any other Committees involved in selection matters.**

Please list all relationships within the selection period with individuals, businesses and/or other entities that may create a conflict of interest or which you believe might create the appearance of a conflict of interest with any applicant horse, owner or rider or members of their families (attach additional sheets as necessary to make the disclosure complete). Please review the Conflict of Interest Statement attached to the Selection Criteria for additional information.

**If you have no such relationships, please indicate "none."**

	Individual/Entity with whom a conflict exists or may exist.	Relationship to the conflicting Individual/Entity and Nature of conflict.
	EXAMPLE: Jane Rider, applicant	EXAMPLE: My wife is her trainer.
1.		
2.		
3.		
4.		
5.		
6.		
7.		

I certify that I have disclosed on this list and any attachments hereto any and all situations that may constitute conflicts of interest or give the appearance of a potential conflict of interest in connection with the selection criteria for the 2007 \_\_\_\_\_ (insert discipline) Selection Process for the \_\_\_\_\_ (name of competition).

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Print Name

\_\_\_\_\_  
Date