



Conflict of Interest Policy

Revised February 2026

SECTION 1. PURPOSE

USA Boccia is committed to sustaining an ethical workplace free of conflicts of interest and perceived conflicts of interest. Each Decision Maker has the responsibility to administer the affairs of USA Boccia honestly and prudently, and to exercise their best care, skill, and judgment for the sole benefit of USA Boccia. Those people shall exercise the utmost good faith in all transactions involved in their duties, and they shall not use their positions with USA Boccia or knowledge gained therefrom for their personal benefit. The organization's interests must come first in every decision and action.

A “**Conflict of Interest**” or “**Conflict**” exists when a Decision Maker (as defined below) acts on behalf of USA Boccia in connection with a transaction to which USA Boccia is a party, where the Decision Maker’s actions or relationships present the potential for improper personal gain or advantage, or for an adverse effect on the interests of USA Boccia, or where the Decision Maker’s actions or relationships create the appearance that the Decision Maker will not be able to put USA Boccia’s interests first. A “**conflict of interest**” also exists when a Decision Maker participates in a benefits or services allocation decision that directly impacts the Decision Maker. 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 that create conflicts of interest as a guide to the types of 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 USA Boccia) and/or relationships that can create conflicts of interest.

USA Boccia requires that any of its Decision Makers recognize and attempt to avoid activities or investments that involve, might appear to involve, or could result in a potential conflict of interest.

SECTION 2. PERSONS CONCERNED

This Conflict-of-Interest Policy is applicable to all USA Boccia Decision Makers. Decision Makers include, but are not limited to, members of USA Boccia, including members of its Board of Directors (the Board of USA Boccia), and staff.

SECTION 3. 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 USA Boccia; (2) Persons and firms from whom USA Boccia leases property and equipment; (3) Persons and firms with whom USA Boccia 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 USA Boccia; (6) Agencies, organizations, and associations which affect the operations of USA Boccia; (7) Family members, friends, and other employees. A “**Family Member**” is defined as a spouse, parent, child or a spouse of a child, brother, sister, or spouse of a brother or sister of a Decision Maker.

A conflicting interest may be defined as an interest, direct or indirect, with any persons or firms mentioned above. The list below is not intended to be an all-inclusive list of every instance that may create a conflict of interest, but, rather, is simply a sample of the types of relationships and activities that could create 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 should be made and the advice sought from the Ethics/Judicial Committee.

Related Party Transaction, unless otherwise specifically excluded herein, a “Related Party Transaction” means any transaction, agreement, or any other arrangement in which a Related Party has a financial interest and in which USA Boccia, or any Affiliate, is a participant.

The assessment of, and any determination concerning any Related Party Transaction, must be considered in strict compliance with the adopted policies and procedures of USA Boccia.

c. Related Party A “Related Party” means any:

- i. Officer, as defined by statute;
- ii. Director, as defined by statute;
- iii. Key Employee, as defined by statute;
- iv. founder of the Corporation;
- v. individual who has made substantial monetary contributions to the Corporation;
- vi. Relative, as defined by statute, of an Officer, Director, Key Employee, founder or substantial contributor.
- vii. corporate entity where an Officer, Director or Key Employee, or a Relative thereof, serves as an officer, director, trustee, key employee or partner, or the equivalent thereof.

d. Financial Interest A person has a financial interest if the person has, directly or indirectly, through business, investment, or family:

- i. An ownership or investment interest in any entity with which USA Boccia has a transaction or arrangement,
- ii. A compensation arrangement with USA Boccia or with any entity or individual with which USA Boccia has a transaction or arrangement, or
- iii. A potential ownership or investment interest in, or compensation arrangement with, any entity or individual with which USA Boccia is negotiating a transaction or arrangement.

Compensation includes direct and indirect remuneration as well as gifts or favors that are not insubstantial. A financial interest is not necessarily a Conflict of Interest and/or Related

Party Policy. A person who has a financial interest may have a Conflict of Interest and/or Related Party Policy only if the appropriate governing board or committee decides that a Conflict of Interest and/or Related Party Policy exists.

SECTION 4. INTERPRETATION OF THIS CONFLICT-OF-INTEREST POLICY

The areas of conflicting interest and relations in those areas which may give rise to a conflict, as listed in Section 3, AREAS IN WHICH CONFLICTS MAY ARISE, are not exhaustive. Decision Makers should, in the first instance, attempt to avoid all relationships and activities which may give rise to a potential conflict of interest, whether or not listed expressly in Section 3.

However, the fact that one of the interests described in Section 3 exists does not necessarily mean that a conflict exists, or that the conflict, if it exists, is material enough to be of practical importance, or if material, that upon full disclosure of all relevant facts and circumstances it is necessarily adverse to the interests of USA Boccia. However, it is USA Boccia's policy that the existence of any of the interests described or similar in nature to those described in Section 3 shall 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 shall be the continuing responsibility of each Decision Maker to scrutinize his/her transactions and outside business interests and relationships for potential conflicts and to immediately make such disclosures.

SECTION 5. DISCLOSURE POLICY AND PROCEDURE

In addition to the mandatory disclosures required from each Decision Maker under Section 9 and Section 10 of this policy, any individual with a good faith belief that a Decision Maker has a conflict of interest may notify USA Boccia of such perceived conflict pursuant to the procedures set forth below. Furthermore, should any Decision Maker become aware of any undisclosed conflict of interest, or any conflict of interest not fully disclosed, such person should make full disclosure of their knowledge of the conflict of interest involved to USAboccia@gmail.com which shall bring the matter to the attention of the board.

After disclosure of the conflict or potential conflict of interest and all material facts, and after any discussion with the interested person, the Ethics/Judicial Committee shall decide if a conflict of interest exists pursuant to Section 6 below, and if there are mitigating measures that could be implemented to permit USA Boccia to move forward with the transaction or activity.

Transactions with parties with whom a conflicting interest exists may be undertaken only if all the following, at a minimum, are observed:

- 1) The conflicting interest is fully disclosed;

- 2) The person with the conflict of interest is excluded from the discussion and approval of such transaction;
- 3) A competitive bid or comparable valuation exists; and
- 4) The Ethics/Judicial Committee has determined that the transaction is in the best interest of the organization pursuant to Section 6 below.

SECTION 6. PROCEDURES FOR ADDRESSING POSSIBLE CONFLICTS OF INTEREST WITH RESPECT TO TRANSACTIONS OR BUSINESS OF USA BOCCIA

In the event a possible conflict of interest exists with respect to a proposed transaction, promptly and before any decision is made regarding the proposed transaction, the proposed transaction shall be addressed as follows:

- 1) The interested person may make a presentation to the USA Boccia representative which may be convened telephonically, regarding the transaction or arrangement involving the possible conflict of interest.
- 2) The representative shall review alternatives to the proposed transaction or arrangement as presented.
- 3) After exercising due diligence, the representative shall determine whether USA Boccia can obtain with reasonable efforts a more advantageous transaction or arrangement from a person or entity that would not give rise to a conflict of interest.
- 4) If a more advantageous transaction or arrangement is not reasonably possible under circumstances not producing a conflict of interest, the Ethics/Judicial Committee shall determine by a majority vote whether the transaction or arrangement is in USA Boccia's best interest, for its own benefit, and whether it is fair and reasonable. In conformity with the above determination the Ethics/Judicial Committee shall inform the board or committee whether there is a conflict of interest precluding USA Boccia from entering into the transaction or arrangement, or if there are mitigating measures that may be implemented to alleviate concerns regarding the potential conflict of interest.

SECTION 7. VIOLATIONS OF THE CONFLICTS OF INTEREST POLICY

- 1) If the Ethics/Judicial Committee has reasonable cause to believe a Decision Maker has failed to disclose actual or possible conflicts of interest, it shall promptly inform the Decision Maker of the basis for such belief and afford the member an opportunity to explain the alleged failure to disclose.
- 2) If, after hearing the member's response and after making further investigation as warranted by the circumstances, the Ethics/Judicial Committee determines the Decision Maker has failed to disclose an actual or possible conflict of

interest, it shall refer the matter to the Ethics/Judicial Committee to take appropriate disciplinary and corrective action.

- 3) While any such failure to disclose an actual or possible conflict of interest is under investigation, the Decision Maker shall be precluded from engaging in further decisions of USA Boccia that bear any relation whatsoever to the matter that is the subject of the actual or possible conflict of interest.

SECTION 8. RECORDS OF PROCEEDINGS:

The minutes of the Ethics/Judicial Committee meetings shall contain:

- 1) The names of the people who disclosed or otherwise were found to have a connection with an actual or possible 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/Judicial Committee's decision as to whether a conflict of interest in fact existed.
- 2) The names of the people who were present for discussions and votes relating to the transaction or arrangement, the content of the discussion (including, but not limited to, an analysis of the fairness and reasonableness of the transaction or arrangement in question), including any alternatives to the proposed transaction or arrangement, and a record of any votes taken in connection with the proceedings.

SECTION 9. ANNUAL STATEMENTS

Each Decision Maker shall annually sign and submit to the representative a statement, using the form attached hereto, 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 USA Boccia 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. The disclosure statements shall be reviewed by the Ethics/Judicial Committee. Each annual disclosure shall be reviewed and addressed by the Ethics/Judicial Committee.

Any actual, perceived, or potential conflict of interest should be disclosed in the annual statement.

Any new USA Boccia employee shall submit a conflict-of-interest disclosure statement within 14 days of his or her hiring by USA Boccia. Any other new Decision Maker shall submit a conflict-of-interest disclosure statement by the earlier of 14 days after his or her

appointment or his or her first board, committee, or task force meeting. In no event shall a Decision Maker participate in any decisions to commit USA Boccia to a proposed transaction or in athlete or team selection procedures prior to submission of his or her conflict-of-interest disclosure statement.

USA Boccia shall maintain copies of all Annual Statements submitted under this Section 9 Annual Statements.

SECTION 10. PERIODIC STATEMENTS / UPDATES

Each Board member, and staff, and employee shall submit to USA Boccia a signed statement as necessary describing any new potential conflicts of interest as and when such potential conflicts of interest arise. The USA Boccia representative shall maintain copies of all Periodic Statements or updates submitted under this Section 10.

USA BOCCIA CONFLICT OF INTEREST DISCLOSURE STATEMENT

I, _____, am a member of USA Boccia and serve in the following role(s):

Board of Directors

Staff

Committee Member

Please specify which committee(s) _____

Other

Please specify _____

I attest to the following:

I have received the USA Boccia Conflict of Interest Policy (the "Policy").

I have read and understand the Policy.

I agree to comply with the Policy.

I understand that USA Boccia 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.

Note: This disclosure statement also requires you to provide information with respect to certain other parties that are related to you. These persons are called "affiliated persons" and include, but are not limited to:

a) Your spouse, domestic partner, child, mother, father, brother, sister, grandparent, cousin or other blood relative;

b) 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

c) 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.

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 board or the USA Boccia representative or the Ethics/Judicial Committee immediately.

Signature

Date

Printed Name