



**USA TRIATHLON**  
**STATEMENT OF ETHICS AND CODE OF CONDUCT**

*April 2022*

**I. STATEMENT OF ETHICS**

USA Triathlon is proud to serve as the National Governing Body for triathlon, as well as duathlon, aquathlon, aquabike, winter triathlon, off-road triathlon, paratriathlon and indoor and virtual multisport events in the United States. Its mission is to provide resources that empower members of the triathlon/multisport community to reach their full potential.

USA Triathlon believes in maintaining an atmosphere of mutual respect toward each other as well as those USA Triathlon conducts business with and those we may encounter during the execution of duties and activities.

USA Triathlon embraces diversity, equity, inclusion and access in all aspects of USA Triathlon activities and respects others without regard to race, ethnicity, color, religion, national origin, sex, gender identity, sexual orientation, veteran status, or disability.

All USA Triathlon athletes, staff, members and affiliated individuals will, at all times:

- Show respect for others
- Treat others fairly
- Conduct themselves with honesty and integrity
- Work with competence and accountability
- Exemplify teamwork
- Understand and comply with the laws, regulations, and codes of conduct governing the conduct of USA Triathlon's business, both domestic and foreign
- Recognize that the appearance of unethical conduct can cause harm and should be considered as a part of acting ethically.

## II. CODE OF CONDUCT

USA Triathlon has adopted this Code of Conduct (Code) to support this mission and with the expectation that the people who work for, or on behalf of USA Triathlon conduct themselves consistently with the USA Triathlon's mission, guiding principles and statement of ethics. Affiliated Individuals shall accomplish that mission while:

- A. Maintaining clear and high standards of accountability and transparency,
- B. Resolving all alleged ethical and conduct violations in a fair, direct, and prompt manner,
- C. Preserving USA Triathlon's stewardship role for the sports of Triathlon,
- D. Conducting operations in a manner that protects the health and safety of Affiliated Individuals and all people in the communities where they operate,
- E. Following all applicable rules and laws,
- F. Ensuring that applicable laws, regulations and codes of conduct are understood and followed,
- G. Handling all USA Triathlon work and transactions with honesty, and
- H. Recording all USA Triathlon activities accurately.

This document delineates the principles and procedures for defining, preventing violations of, disclosing, and remediating violations of USA Triathlon's ethical and conduct standards. Included within the scope of those standards are potential, actual, or perceived conflicts of interest, illegal or unethical conduct, and conduct detrimental to USA Triathlon and/or its Vision and Mission set forth in its Bylaws. (Bylaws, Section 3).

## III. APPLICABILITY

This Code is applicable to all USA Triathlon Affiliated Individuals. "Affiliated Individual" shall mean all USA Triathlon members, board of directors, officers, committee members, other governance group members, employees, staff, interns, athletes, coaches, contractors, sub-contractors, vendors, consultants, volunteers and representatives of USA Triathlon member organizations that involve or are governed by USA Triathlon.

## IV. ORGANIZATIONAL EXPECTATIONS

### A. General Conduct

Any one or more of the following shall constitute violations of the USA Triathlon Code of Conduct and ethics obligations:

1. **Equal Treatment.** USA Triathlon strictly prohibits unlawful discrimination or unlawful harassment of any kind. Treating someone in an unlawful discriminatory or harassing manner is a violation of this Code.

2. **SafeSport Policy.** Any violation of the USA Triathlon SafeSport Policy shall be considered a violation of this Code.
3. **Anti-Doping Policy.** Affiliated Individuals are expected to follow and abide by the USA Triathlon and the United States Olympic and Paralympic Committee (USOPC) anti-doping policies. Any violation of those policies is a violation of this Code.
4. **Fraud, Deception.** Any act of fraud, deception, improper use of assets (including intellectual property, trade secrets and equipment), or dishonesty in connection with any USA Triathlon related activity and sanctioned event is a violation of this Code.
5. **Inappropriate Conduct.** Any obscene language or gesture, or other defamatory, demeaning, or threatening language (whether written or oral) or conduct directed towards an Affiliated Individual is a violation of this Code.
6. **Conduct Detrimental.** Any other material and intentional wrongful act, conduct or failure to act not provided for above, which is detrimental to the image or reputation of USA Triathlon is a violation of this Code.
7. **Disclosure of Confidential Information.** Any intentional or reckless unauthorized disclosure of USA Triathlon confidential information is a violation of this Code.

B. Legal and Regulatory Compliance

1. All Affiliated Individuals are expected to follow with rules, policies and procedures of USA Triathlon and the USOPC.
2. All Affiliated Individuals are expected to abide by the rules governing fair play and competitive manipulation in the Olympic and Paralympic movements (as well as the International Paralympic Committee Code of Ethics, Section 6.1, as applicable).
3. No individual who is an employee, contractor, or agent of USA Triathlon may assist a member or former member of USA Triathlon in obtaining a new job (excluding the routine transmission of administrative or personnel files) if the individual knows that the member or former member a) violated the policies or procedures of the U.S. Center for SafeSport related to sexual misconduct; and/or b) was convicted of a crime involving sexual misconduct with a minor in violation of applicable law or the policies and procedures of the U.S. Center for SafeSport.
4. USA Triathlon requires all Affiliated Individuals to abide by all applicable United States federal, state, and local laws, including the Ted Stevens Olympic and Amateur Sports Act, and foreign laws, as applicable. This Code operates in tandem with the policies and procedures of USA Triathlon and with all applicable U.S. and foreign laws and

regulations. Where more than one set of laws, regulations, local customs, or norms exist, Affiliated Individuals shall use the highest standard of behavior or the most stringent requirement that applies.

All questions regarding conflicts of law, such as a conflict between any United States and foreign law, or regarding the legality of any action should be directed immediately to the USA Triathlon Senior Counsel for information and guidance.

## V. REPORTING

Affiliated Individuals are required to report any potential violations of this Code to USA Triathlon’s Senior Counsel at [legal@usatriathlon.org](mailto:legal@usatriathlon.org) or [nellie.viner@usatriathlon.org](mailto:nellie.viner@usatriathlon.org).

In addition to reporting to the Senior Counsel, Affiliated Individuals may also report violations as set forth in the USA Triathlon Whistleblower Policy by contacting:

Victoria Brumfield, Chief of Staff	<a href="mailto:Victoria.brumfield@usatriathlon.org">Victoria.brumfield@usatriathlon.org</a>
Katie Willemarck, Chief Financial Officer	<a href="mailto:Katie.willemarck@usatriathlon.org">Katie.willemarck@usatriathlon.org</a>

USA Triathlon maintains an “open door” for anyone who has questions or concerns. USA Triathlon will support all efforts to comply with this Code. If Affiliated Individuals need advice concerning the applicability of the Code, they should consult one of the foregoing contacts.

## VI. ANTI-RETALIATION STATEMENT

USA Triathlon honors and respects the rights of all people, including Affiliated Individuals, to report violations of this Code. In addition, pursuant to Section 220501(b)(11) of the Ted Stevens Act, USA Triathlon will not tolerate any adverse or discriminatory action, or the threat of an adverse or discriminatory action, including removal from a training facility, reduced coaching or training, reduced meals or housing, and removal from competition, carried out against protected individuals as a result of any communication, including the filing of a formal complaint, by the protected individual or a parent or legal guardian of the protected individual relating to the allegation of physical abuse, sexual harassment, or emotional abuse, with (a) the Center; (b) a coach, trainer, manager, administrator, or official associated with the corporation; (c) the Attorney General; (d) a Federal or State law enforcement authority; (e) the Equal Opportunity Commission; or (f) Congress.

## VII. RESOLUTION

The USA Triathlon Ethics Committee shall oversee implementation of and compliance with this Code. (Bylaws, Section 8.14(b)) The Committee shall review and investigate matters of ethical impropriety and make recommendations on such matters to the Board of Directors as

appropriate. The Committee shall determine whether a complaint submitted to it falls within its jurisdiction.

The USA Triathlon Grievance and Disciplinary policy shall be used to resolve any potential violation of USA Triathlon's bylaws, policies or procedures that fall outside the jurisdiction of the Ethics Committee or for complaints that require a hearing.

#### **VIII. POLICY OWNER**

Nellie Viner, Senior Counsel [legal@usatriathlon.org](mailto:legal@usatriathlon.org) or [nellie.viner@usatriathlon.org](mailto:nellie.viner@usatriathlon.org)

#### **IX. RESOURCES**

##### Athlete Ombuds

The Office of the Athlete Ombuds offers independent, confidential advice to elite athletes regarding their rights and responsibilities in the Olympic and Paralympic Movement, and assists athletes with a broad range of questions, disputes, complaints and concerns

Athlete Ombudsman  
(719) 866-5000  
[ombudsman@usathlete.org](mailto:ombudsman@usathlete.org)  
[www.usathlete.org](http://www.usathlete.org)

##### USOPC Ethics and Compliance Team

The USOPC Ethics and Compliance team seeks to empower athletes, NGB employees and volunteers and other individuals within the U.S. Olympic and Paralympic Movement to raise and report their concerns. Specifically, the USOPC's Ethics and Compliance team reviews and investigates certain reports regarding NGB compliance with the Ted Stevens Olympic and Amateur Sports Act and the USOPC or NGB Bylaws, including conflicts of interest and governance issues. The team also reviews and investigates allegations of USOPC non-compliance and alleged USOPC code of conduct violations.

Chief Ethics & Compliance Officer USOPC, Holly Shick  
Integrity Portal:  
<https://secure.ethicspoint.com/domain/media/en/gui/53006/index.html>

##### Additional Resources

[Prevention of Competition Manipulation](#)  
[IPC Code of Ethics](#)  
USA Triathlon Conflict of Interest Policy can be found [here](#)

USA Triathlon Gifts & Entertainment Policy can be found here

USA Triathlon Whistleblower Policy can be found [here](#)

USA Triathlon Grievance and Disciplinary Policy can be found [here](#)