UNITED STATES TENNIS ASSOCIATION INCORPORATED (USTA)

CONFLICT OF INTEREST AND DISCLOSURE POLICY

1. Purpose

USTA is committed to maintaining an ethical organization free of conflicts of interest. Each Affiliated Individual (defined below) must administer USTA affairs honestly and prudently, exercise best care, skill, and judgment solely for USTA's benefit, and not use their position or knowledge for personal benefit. USTA's interests must be the first priority in all decisions.

A "transaction" means any contract, agreement, or relationship involving the sale or purchase of goods, services, or rights, the provision of grants or loans, or any other financial relationship with USTA. This Policy does not list every possible conflict situation but provides guidance on common scenarios. All Affiliated Individuals must become familiar with, and abide by, all USTA bylaws, rules, regulations, and policies, including this Policy.

2. Applicability

This Policy applies to all Persons, Members, Volunteers, Contractors, Vendors, Employees, and Key Persons (collectively, "Affiliated Individuals"). Entities formally engaged in business with USTA may be required to comply contractually.

3. Definitions

(a) **"USTA"** – United States Tennis Association Incorporated, USTA National Tennis Center Incorporated, USTA Player Development Incorporated, USTA Foundation Incorporated, and USTA Coaching, Inc.
(b) **"Board"** – The Board of Directors of USTA.
(c) **"Chief Audit Officer"** – The Chief Legal Officer for USTA; assists and advises Employees on matters under this Policy.
(d) **"Chief Ethics Officer"** – Senior executive overseeing USTA's ethical conduct, compliance programs, and corporate integrity; establishes ethical standards and provides guidance.
(e) **"Contractor"** – Any person or entity doing business with USTA.
(f) **"Employee"** – A person employed by and providing services to USTA.
(g) **"Key Person"** – Any individual (other than a director or officer) who, whether or not employed by USTA, (a) has responsibilities or powers similar to those of directors or officers, (b) manages USTA or a substantial portion of its activities, assets, or finances, or (c) has a role in controlling a substantial portion of USTA's capital expenditures or operating budget.
(h) **"Members"** – Anyone with a USTA membership account.
(i) **"Person"** – Any individual, corporation, company, association, firm, partnership, society, member, athlete, or other organization.
(j) **"Volunteer"** – A person donating time or services to USTA, including Board Members, Officers, Committee and Task Force Members, hearing panel members, and USTA members. A person remains a Volunteer even when reimbursed for costs.
(k) **"Related Party"** – Any entity in which an Affiliated Individual or Relative holds ≥35% ownership/beneficial interest (or ≥5% in a partnership or professional corporation).
(l) **"Related Party Transaction"** – Any transaction with USTA in which a Related Party has a financial interest.
(m) **"Relative"** – Spouse, ancestors, siblings (whole or half-blood), children (natural or adopted), grandchildren, great-grandchildren, spouses of any of the foregoing, or domestic partner.
(n) **"Relatives and Close Associates (RCAs)"** – Spouses/domestic partners, children, siblings, parents, in-laws, close friends, and business partners.

4. Conflicts of Interest and Loyalty

A Conflict of Interest exists when an Affiliated Individual's activities, interests, or relationships interfere with, influence, or could interfere with their responsibilities to USTA. The activities and interests of an Affiliated Individual's RCAs must also be considered.

A conflict also exists in athlete or team selection when an Affiliated Individual participates in a selection decision involving an RCA athlete, or in a benefits/services allocation decision directly impacting the individual or their RCAs.

Deemed Conflicts. The following are deemed potential Conflicts of Interest:

(a) A contract or transaction between USTA and an Affiliated Individual or Relative.

(b) Any Related Party Transaction.

(c) An Affiliated Individual competing with USTA in providing services or fulfilling contracts.

(d) An Affiliated Individual having a financial interest in, or serving as a director, officer, employee, agent, partner, or consultant to, an entity that competes with USTA.

Duty of Loyalty. Affiliated Individuals owe a duty of loyalty to the USTA and must avoid the appearance of: using their position for private gain, giving preferential treatment, impeding USTA operations, or making decisions without impartiality. An Affiliated Individual may not do indirectly, through family or friends, what this Policy precludes directly.

5. Areas Where Conflicts of Interest May Arise

Conflicts of interest may be:

(a) Actual: An Affiliated Individual has an existing relationship that may influence their decisions;

(b) Potential: A reasonable basis exists to believe a future event may create a conflict; or

(c) Perceived: It appears to another individual that a connection exists between an Affiliated Individual and a person or organization that has influenced a decision made by the Affiliated Individual.

Conflicts of interest often arise due to the relationships Affiliated Individuals have with the following third parties:

i. Persons or entities supplying goods and services to USTA;

ii. Persons or entities leasing property or equipment to USTA;

iii. Persons or entities with whom USTA is dealing or planning to deal in connection with the gift, purchase or sale of real estate, securities or other property;

iv. Competing or affinity organizations;

v. Donors and others supporting USTA;

vi. Agencies, organizations, and associations which affect the operations of USTA; or

vii. RCAs and other employees of USTA.

Potential conflicts of interest often arise when Affiliated Individuals have an interest, directly or indirectly, with any persons or entities mentioned above. Examples of potential conflicts of interest are listed in **Appendix A**, attached hereto. The list is not intended to be an all-inclusive list of every instance that may create a potential conflict of interest, but, rather, is simply a sample of the types of relationships and activities that may give rise to a conflict of interest. If an Affiliated Individual or other disclosing individual has any question as to whether a relationship or activity may create a conflict of interest, a disclosure must be made.

6. Standards of Conduct

The following standards apply to all Affiliated Individuals:

(a) **Gambling/Trading on Tennis:**

- The USTA strictly prohibits Affiliated Individuals from participating in, facilitating, or aiding and abetting—directly or indirectly—any form of sports betting, wagering, or financial speculation involving tennis at any level (junior, amateur, collegiate, or professional) as well as any tennis-related or US Open related activities.
- Prediction Markets & Event Contracts: The USTA strictly prohibits Affiliated Individuals from placing wagers, trading binary options, or holding positions on public, private, or decentralized prediction markets and event-contract platforms (e.g., Kalshi, Polymarket, or similar platforms). Employees may not trade on any contracts tied to tennis or USTA-event outcomes, including but not limited to match results, player statistics, tournament metrics, administrative decisions, US Open/event activities or sales or organizational policies.
- By virtue of your employment or volunteer service with the USTA, you **may** be placed on a Do-Not-Bet/Trade list relating solely to the sport of tennis and tennis-event activities maintained by, or on behalf of, the USTA (the "Do-Not-Bet/Trade List"). Placement on the Do-Not-Bet/Trade List is a standard sports-industry requirement designed to preserve the integrity of professional tennis and is not a reflection of any individual conduct or suspicion. You will remain on the Do-Not-Bet/Trade List for the duration of your employment or volunteer service, and potentially for a period thereafter, as determined by the USTA. Employees should consult the USTA Handbook for more details. Volunteers holding roles that require inclusion on the Do-Not-Bet/Trade List will be notified in advance and will be provided with USTA's Sport Integrity Policies.

(b) **Political Activity:** Affiliated Individuals may not use any USTA affiliation in connection with the promotion of political activities, religious matters, or to interfere with elections.

(c) **Prohibited Personnel Practices:** Affiliated Individuals shall not engage in any prohibited personnel practices, including unwelcome advances or verbal/physical conduct. All must abide by the USTA Harassment Policy.

(d) **Use of USTA Property:** Affiliated Individuals must protect and conserve USTA property (name, logo, trademarks, equipment, funds, facilities, etc.). No use for non-USTA purposes or private gain. All materials generated within the scope of employment or volunteering are USTA property and may only be destroyed or removed from the USTA in accordance with established USTA procedures.

(e) **Use of USTA Information:** Affiliated Individuals must exercise maximum discretion in disseminating information. Refer press to the Public Relations Department; refer requests for non-public information to General Counsel. No Affiliated Individual shall use non-public information for private interest without written consent of the Chief Ethics Officer or General Counsel.

(f) **Referrals:** Referrals by Affiliated Individuals should not be construed as USTA endorsements. Make clear that any referral is not endorsed by the USTA, unless the USTA Board agrees otherwise.

(g) **Gifts:** Affiliated Individuals shall abide by the USTA Gift and Entertainment Policy.

(h) **Outside Activities:** No outside activity may be construed as official USTA action without prior written consent of the Chief Ethics Officer, General Counsel, or Audit Committee Chair. The use of USTA's name, logo, trademarks, or an Affiliated Individual's title requires prior written consent. All writings and publications prepared within the scope of USTA service are USTA's work product.

7. Interpretation of this Policy

The examples in this Policy are not exhaustive. Affiliated Individuals must disclose all relationships and activities that may give rise to a conflict, whether or not specifically listed. Disclosure does not necessarily prohibit involvement in the disclosed activity or with USTA; conflicts may be mitigated through appropriate measures. However, all interests must be disclosed before any transaction is consummated or vote taken. Each

Affiliated Individual has a continuing responsibility to scrutinize their transactions, outside business interests, and relationships for potential conflicts and to disclose them promptly.

8. Disclosure Requirements

Annual Disclosure. All Affiliated Individuals must proactively disclose conflicts and, at least on an annual basis, sign and submit USTA's standardized disclosure form to the Audit Committee and Chief Ethics Officer.

(a) **New Employees:** Any new employee must submit a conflict of interest disclosure form within 14 days of hire.

(b) **Other new Affiliated Individuals:** Any other new Affiliated Individual must submit a conflict of interest disclosure form within 30 days of appointment or their first board, committee, or task force meeting, whichever is earlier.

No Affiliated Individual may participate in decisions committing USTA to a proposed transaction or athlete/team selection before submitting their disclosure.

Ongoing Updates. In addition to annual disclosures, Affiliated Individuals must submit an updated disclosure form to the Audit Committee for any new or material changes to previously disclosed conflicts as they arise.

Meeting Protocol. Volunteers must review meeting agendas beforehand and state any conflicts at the start of each meeting. Conflicted individuals must recuse themselves from all discussion and voting on conflicted items by leaving the room or teleconference entirely and returning only when the discussion or vote on the agenda item is completed. If a conflict becomes apparent mid-discussion, an impacted volunteer must recuse themselves immediately. Meeting minutes must reflect all disclosures and recusals.

Each disclosure will be reviewed by the Audit Committee. USTA will retain copies of all conflict of interest disclosure forms in accordance with its document retention policies.

9. Procedures for Reviewing and Managing Conflicts of Interest

General Process. The Office of General Counsel collects conflict of interest disclosures for the Audit Committee and Chief Ethics Officer. Chief Executive Officer and Board disclosures are provided to the Audit Committee. The review process is as follows:

(a) The Audit Committee or the Chief Ethics Officer, as applicable, will review the disclosure and request additional information if needed;

(b) The Audit Committee or the Chief Ethics Officer, as applicable, will determine whether an actual or apparent conflict exists;

(c) If a conflict exists, the Audit Committee or the Chief Ethics Officer, as applicable, will determine whether there are appropriate mitigating measures, which may include limitation of involvement, separation from certain activities, or ceasing the activity; and

(d) If a material conflict is identified, the Audit Committee or the Chief Ethics Officer, as applicable, will communicate the determination and its direction on conflict management to the Affiliated Individual in writing. If a determination limits an individual's right to participate in sport, the Affiliated Individual will be provided an opportunity for a hearing.

Proposed Transactions. When a conflict relates to a proposed USTA transaction or arrangement: (i) the interested person may present to the Audit Committee or Chief Ethics Officer the proposed transaction or arrangement; (ii) the interested person must recuse themselves from all discussion and approval; (iii) the Audit Committee or Chief Ethics Officer will determine whether a conflict exists (considering competitive bids where applicable); and (iv) the Audit Committee or Chief Ethics Officer will determine mitigating measures or may prohibit the transaction entirely.

Drafting Selection Procedures and Athlete/Team Selection. Additional requirements apply to drafting selection procedures and athlete/team selection: All Affiliated Individuals involved in drafting selection procedures or serving on discretionary selection committees who have a potential conflict must disclose it to the Audit Committee. If the individual has not completed a conflict of interest disclosure form on which the Audit Committee has already made a determination, the following process applies:

(a) The interested Person may present to the Audit Committee regarding the potential conflict of interest;

(b) The interested Person will recuse themselves from discussion regarding the potential conflict of interest;

(c) The Audit Committee will determine whether a conflict of interest exists; and

(d) If the Audit Committee determines that a conflict of interest exists, it will mandate the individual's recusal or determine the extent of permissible participation (e.g., providing information but not voting).

No Person with a conflict may unduly influence other committee members in the selection process. Vacancies caused by recusal will be filled per USOPC-approved procedures. If a vacancy results in the athlete representative position, another athlete representative who meets the qualifications for that committee will be appointed and approved by a representative group of athletes.

Employee-Specific. If a supervisor has reasonable cause to believe an Employee has failed to disclose a conflict, the supervisor must inform the Employee, afford the Employee an opportunity to explain, and, if warranted, notify the Chief Ethics Officer. Disciplinary action, as taken by the Chief Ethics Officer, may take the form of admonishment, written reprimand, reassignment, suspension, removal, or such other action as deemed appropriate. No action will be taken against an Employee who received written approval from the Chief Ethics Officer for the activity alleged to be in violation.

10. Related Party Transactions

Disclosure. Before USTA enters into any Related Party Transaction, the Related Party must disclose to the Board the material facts of the Related Party's interest.

Review and Approval. The Board must determine that the transaction is fair, reasonable, and in USTA's best interest at the time of the determination. The Related Party may not be present at or participate in the Board's deliberations or vote on the transaction, although the Board may request that the Related Party present information before deliberations commence.

Statutory Exceptions. These procedural requirements do not apply to: (a) a transaction in which the Related Party's financial interest is de minimis; (b) a transaction that is not customarily reviewed by the Board in the ordinary course of business and is available to others on similar terms; or (c) the provision of benefits to a Related Party solely as a member of a class that USTA intends to benefit as part of its mission. Even in an excepted transaction, the Related Party may not seek to improperly influence the decision-maker.

Documentation. USTA must document the existence of the Related Party Transaction, the Related Party's interest, and the Board's determination in USTA's records, including the minutes of any meeting at which the transaction was discussed or voted upon.

11. Reporting Violations and Enforcement

Reporting. Any individual with a good faith belief that an Affiliated Individual has a conflict of interest may notify the Chief Ethics Officer or Audit Committee Chair of such perceived conflict by emailing the individual(s) identified in Section 12. Reports may be made anonymously, if desired. All good faith reports are protected under the USTA Whistleblower/Anti-Retaliation Policy.

Investigation and Enforcement. If the Audit Committee or Chief Ethics Officer has reasonable cause to believe an Affiliated Individual has failed to disclose a conflict of interest, it will promptly inform the Affiliated Individual, afford the individual an opportunity to explain the alleged failure to disclose, investigate as warranted, and take appropriate disciplinary and corrective action, if necessary. All decisions will be communicated in writing to the Affiliated Individual and are final. In the event that a member of the Audit Committee is not disinterested in a particular alleged violation un review, that member shall recuse themselves from the investigation and decision-making process. During investigation, the Affiliated Individual is precluded from further engaging in USTA decisions related to the conflict of interest.

Anti-Retaliation. USTA has zero tolerance for retaliation against anyone who makes a good faith report of a conflict of interest or cooperates with an investigation of the same. Retaliation includes any adverse or discriminatory action, or threat thereof, against an athlete, employee, board member or officer, member, task force member, hearing panel member, volunteer, or other person associated with USTA as a result of any grievance, report, complaint, or communication of misconduct to USTA, the USOPC, the USOPC's Office of Athlete Ombuds, or any law enforcement agency or government entity. Examples of adverse or discriminatory actions that could be considered retaliatory include, but are not limited to: (i) removal from a USTA Office (Purchase, USTA National Tennis Center, NY Times Square Office, or USTA National Campus); (ii) removal from competition, and (iii) removal from a volunteer position. No reprisal will be taken for disclosing information to or seeking assistance from the Office of Athlete Ombuds.

12. Reporting Resources

(a) **USTA Resources.**

(i) **USTA Chief Ethics Officer:** Andrea Hirsch – hirsch@usta.com

(ii) **Audit Committee Chair:** See USTA Yearbook for identification and contact information by Term.

(iii) **EthicsPoint (Anonymous Whistleblower Hotline):** USTA has contracted with EthicsPoint, an independent service provider specializing in secure, anonymous whistleblower/hotline services. Any USTA Employee, Volunteer, or Person may anonymously report a suspected policy violation. USTA's Whistleblower Policy is accessible here.

Phone: (866) 654-6516

Website: www.ethicspoint.com

(b) **USOPC Resources.**

(i) **USOPC Integrity Portal:** For concerns related to involvement in the Olympic and Paralympic Movement, individuals may submit a confidential/anonymous report.

Website: usopc.auditpoint.com

Hotline: 877-404-9935

(ii) **Athlete Ombuds:** Team USA athletes may contact the Athlete Ombuds for independent, confidential advice on sport-related matters, including rights, applicable rules, policies, disputes, and grievances. The Athlete Ombuds can also help Team USA athletes connect with legal counsel or mental health resources if needed. All other USTA athletes are welcome to visit the Athlete Ombuds website to review informational resources and should work directly with the USTA to understand additional resources and options available to them.

Email: ombudsman@usathlete.org

Website: www.usathlete.org

To the extent possible, USTA will take every conceivable action to ensure that any person who reports a suspected violation is shielded from public embarrassment or subject to retaliation.

USTA VOLUNTEER CODE OF ETHICS AND PROFESSIONAL STANDARDS

This Volunteer Code of Ethics and Professional Standards is appended to the USTA Conflict of Interest and Disclosure Policy, and incorporates the Definitions of the same.

Volunteer Service Code of Ethics:

1. Volunteers of the USTA owe a duty of loyalty to the USTA and should always act in the best interests of the USTA. Volunteers should disclose and, where appropriate, refrain from engaging in, any activity that might conflict, or appear to conflict, with the interests of the USTA, or that might result in or create the appearance of:
    a. Using one's position as a Volunteer at the USTA for private gain;
    b. Giving preferential treatment to any person;
    c. Impeding the efficiency or economy of the USTA's operations; or
    d. Making decisions without impartiality.
2. No Volunteer shall participate in or otherwise aid or abet, directly or indirectly, any form of gambling or betting involving tennis.
3. No Volunteer shall publicly disparage the USTA or any of its officers, directors or employees. For purposes of this Section, "disparage" shall mean any negative statement, whether written or oral, about the USTA and its affiliated companies, or any of its officers, directors, or employees.
4. Volunteers are prohibited by law from utilizing any USTA affiliation in connection with the promotion of partisan political activities, religious matters, or from using official authority or influence to interfere with an election or affect its results.
5. Volunteers may not engage in any prohibited personnel practices. Among the practices prohibited by federal law are unwelcome advances or other unwelcome verbal or physical conduct. Volunteers shall abide by the USTA's policy on Harassment.
6. Volunteers have a duty to conduct themselves honestly and responsibly while volunteering for the USTA. Volunteers have a duty to actively protect and conserve USTA property, including confidential information received as a result of being a volunteer and the name, logo, trademarks, equipment, supplies, and other property issued, entrusted or made available by USTA. No Volunteer shall use or allow others to use for non-USTA purposes or for private gain, USTA's confidential information, name, logo, trademarks, funds, staff resources, facilities or property, including but not limited to, official documents distributed, and travel privileges. All materials generated or received by a Volunteer within the scope of providing the Volunteer's time and/or services are the property of the USTA and may not be utilized or further distributed for personal gain, or destroyed or removed from the USTA in accordance with established USTA procedures.
7. Maximum discretion in disseminating information is expected of all Volunteers. Press should be referred to the USTA's Public Relations Department. Other requests for nonpublic information not routinely provided should be referred to the Office of the General Counsel for the USTA. No Volunteer shall, without written consent of the Chief Ethics Officer or Chair of the Audit Committee, make use of or permit others to make use of any information obtained during the course of volunteering that is not available to the general public for purposes of furthering a private interest or for any purpose detrimental to the USTA.
8. Volunteers shall not solicit or accept, directly or indirectly, any gift, gratuity, favor, entertainment, loan, or any other thing of monetary value in excess of $400.00, from any Person who:
    a. has or is seeking to obtain a contractual or other business or financial relationships with the USTA;
    b. has received, is receiving or is seeking to receive a loan or grant from the USTA;
    c. is seeking to affect any official action of the USTA; or
    d. has interests which may be affected substantially by the performance or non-performance of the Volunteer's duty.

There are exceptions, which are detailed in the Conflict of Interest and Disclosure Policy:

1. Decorations and Awards. Volunteers may accept without restriction any decoration or award from any source given in recognition of meritorious public contribution or an achievement.
2. Volunteers may not engage in any outside activity that may reasonably be construed by the public as the official action of the USTA without the prior written consent of the Chief Ethics Officer or Chair of the Audit Committee. In any activity which might be so construed, the use of the USTA's information, name, logo, trademarks, or of a Volunteer's title with the USTA, requires the prior written consent of the Chief Ethics Officer or Chair of the Audit Committee.
3. Publication. All writings and publications that are prepared within the scope of a Volunteer providing their time and/or services at the USTA constitutes USTA's work product and is the property of the USTA. The USTA shall have all rights therein; except, to the extent that the USTA has agreed otherwise, in writing, prior to publication.

Below is a list of procedures related to a violation of the Volunteer Code of Ethics and Professional Standards:

1. If the Board or Committee has reasonable cause to believe that a Volunteer has violated the Volunteer Code of Ethics and Professional Standards, it shall inform the Volunteer of the basis for such belief and afford the Volunteer an opportunity to explain the alleged violation. If, after hearing the Volunteer's response and making further investigation as warranted by the circumstances, the Board determines the Volunteer has violated the Volunteer Code of Ethics and Professional Standards, it shall take appropriate disciplinary and corrective action. The disciplinary action may take the form of admonishment, written reprimand, reassignment, suspension, removal, or such other action as deemed appropriate.
2. The type of disciplinary action to be taken must be determined in relation to the specific violation. Those responsible for recommending and taking disciplinary action must apply judgment to each case, considering the general objectives for meeting any requirement within this Volunteer Code of Ethics and Professional Standards, deterrence of similar offenses by other Volunteers, and maintenance of a high standard of conduct and public confidence. No disciplinary action will be taken against a Volunteer who has received written approval from the Chief Ethics Officer or Chair of the Audit Committee for the activity alleged to be in violation.

This Volunteer Code of Ethics and Professional Standards for USTA Volunteers is not exhaustive, but rather is provided as an overview for reference.

The USTA has contracted with EthicsPoint, an independent service provider specializing in secure and anonymous "Whistle-blower / Hotline" services. The services provided by EthicsPoint enable a USTA Employee or USTA Volunteer to anonymously report a suspected violation of policy via the EthicsPoint phone service or website. To report, call EthicsPoint at (866)654–6516 or access the EthicsPoint website at www.ethicspoint.com and follow the instructions. To the extent possible, USTA will take every conceivable action to ensure that any person who reports a suspected violation is shielded from public embarrassment or subject to retaliation.

For the detailed policy and procedures related to Volunteer conduct, please see the USTA's Conflict of Interest and Disclosure Policy, which every Volunteer reviews and affirms annually.

APPENDIX A

EXAMPLES OF POTENTIAL CONFLICTS OF INTEREST

Potential conflicts of interest often arise when Affiliated Individuals have an interest, directly or indirectly, with any persons or entities mentioned above. Examples of potential conflicts of interest are listed in below. This list is not intended to be an all-inclusive list of every instance that may create a potential conflict of interest, but, rather, is simply a sample of the types of relationships and activities that may give rise to a conflict of interest. If an Affiliated Individual or other disclosing individual has any question as to whether a relationship or activity may create a conflict of interest, a disclosure must be made.

a. An Affiliated Individual has personal relationships with other Affiliated Individuals who they regularly work alongside or who their work affects.

   EXAMPLE: Two board members who are serving at the same time are married.

   EXAMPLE: A board member is the parent of a current national team athlete.

b. Affiliated Individual or an RCA owns stock or holds debt or other proprietary interests in any third party dealing or who may potentially deal with USTA.

   EXAMPLE: An Affiliated Individual owns a 70% interest in a company seeking to enter into a contract with USTA to provide consulting services.

c. Affiliated Individual or an RCA owns a business, maintains a second job, or provides goods or services under a provider, contractor, or consulting agreement, where the outside business provides goods or services to USTA, the United States Olympic or Paralympic Committee (USOPC), or any other USTA related entity.

   EXAMPLE: USTA is contemplating entering into an agreement with a HR consulting company owned by an USTA employee's husband.

d. Affiliated Individual or an RCA holds a position of executive, officer or director, participates in the management of, or is otherwise employed (or formerly employed) by any third party dealing with USTA.

   EXAMPLE: An Affiliated Individual is the CEO of a technology company negotiating a contract with USTA to provide IT services.

e. Affiliated Individual uses USTA's time, personnel, equipment, supplies, or goodwill for anything other than USTA-approved activities, programs, and purposes.

   EXAMPLE: A USTA employee uses a USTA vehicle for a personal road trip.

f. Affiliated Individual solicits gifts or gratuities using their USTA role or accepts personal gifts, loans, gratuities, or discounts from third parties, including situations that may or may not constitute a violation of the USTA's Gift & Entertainment Policy. No personal gift of money should ever be accepted.

   EXAMPLE: A USTA employee using her position at USTA to obtain box seats to a sporting event from a vendor for personal use.

   EXAMPLE: Accepting tickets to an NFL game worth $250 from a business seeking to obtain a contract to provide landscaping services for USTA headquarters.

g. Affiliated Individual or an RCA acts as an agent, representative, or consultant to a business whose interests may conflict with the interests of USTA.

   EXAMPLE: An Affiliated Individual agrees to promote another entity against (or adverse to) USTA in negotiations with potential sponsors or licensees.

h. Affiliated Individual or an RCA has a business relationship with a sponsor, supplier, licensee, or vendor of USTA.

   EXAMPLE: A USTA employee's spouse provides legal services to a USTA sponsor.

i. Affiliated Individual awards USTA business to, or provides favorable treatment to, a business owned or controlled by a volunteer or an RCA.

   EXAMPLE: USTA is contemplating entering into a contract for landscaping services with a company because the landscaping company is owned by an employee's brother.

j. Affiliated Individual drafts selection procedures or participates and/or votes within a discretionary selection committee of USTA when they have a relationship with an athlete who is potentially impacted by the selection procedures (e.g., as coach, trainer, parent, etc.) or when Affiliated Individual might benefit directly or indirectly from the selection method.

   EXAMPLE: USTA employee participating in a decision to select an athlete for an Operation Gold event when the USTA employee is athlete's current coach or family member.

   EXAMPLE: The athlete representative assisting with drafting, voting on, and/or signing the procedures is also competing for a spot on the team for which the procedures are written.

k. Affiliated Individual engages in activities or maintains interests and relationships that interfere with or influence, or have the potential to interfere with or influence, the satisfactory performance of their responsibilities on behalf of USTA or undermine the interests of USTA.

   EXAMPLE: An Affiliated Individual has a significant client who owns or operates a facility being considered as the host of a USTA event.

   EXAMPLE: An athlete is the potential recipient of benefits or services that are being allocated by USTA and participates in the allocation decision.