

U.S. SOCCER CODE OF CONDUCT

WE ARE U.S. SOCCER AND WE ARE THE FUTURE OF SPORT IN THE UNITED STATES

OUR MISSION IS TO MAKE SOCCER THE PREEMINENT SPORT IN THE UNITED STATES

HOW TO USE THIS CODE

The U.S. Soccer Code of Conduct (the "Code") and the FIFA Code of Ethics applies to all persons listed below and referred throughout the document as "team members":

- All employees of U.S. Soccer
- All independent contractors and volunteers¹ serving U.S. Soccer including members of the Board and U.S. Soccer standing committees
- All employees of U.S. Soccer's consolidated subsidiaries¹
- All National Team Players during play, training or otherwise to the extent they are included on a National Team Roster¹
- All U.S. Soccer licensed coaches and referees.

U.S. Soccer expects all individuals who work for or on behalf of U.S. Soccer to embrace and implement the code by reading, acknowledging and implementing the expectations of this code and modeling conduct compliant with this code at all times while working for or representing U.S. Soccer in any and all events.

COMPLIANCE WITH THE LAW AND FIFA, CONCACAF AND USOPC MANDATES

U.S. Soccer serves Member Organizations throughout the United States and is a member of The Fédération Internationale de Football Association (FIFA), The Confederation of North, Central America and Caribbean Association Football (Concacaf) and the United States Olympic and Paralympic Committee (USOPC).

We are committed to complying with all applicable laws, regulations and organizational mandates under which we operate. Should the rules or regulations of FIFA, Concacaf or the USOPC conflict with the laws of the United States, we shall raise these concerns to FIFA, Concacaf and/or the USOPC in a clear manner, while maintaining all legal privileges that may apply.

OTHER U.S. SOCCER POLICIES AND GUIDELINES

The Code does not address all workplace conduct. U.S. Soccer maintains Bylaws and Policies along with additional workplace policies and guidelines which provide further guidance on matters in the Code or address conduct not covered by the Code. Below is a list of additional resources which are subject to amendment from time to time at the discretion of U.S. Soccer, and none of which alter or amend any atwill employment relationship.

POLICIES AVAILABLE ON THE U.S. SOCCER WEBSITE

- U.S. Soccer Bylaws and Polices
- 2021 U.S. Soccer Anti-Doping Policies
- U.S. Soccer Code of Conduct
- U.S. Soccer Whistleblower Policy
- Conflict of Interest Policy
- Safe Soccer Framework

ADDITIONAL RESOURCES

- FIFA Code of Ethics
- USOPC Code of Conduct
- USOPC Athletes Ombuds

¹ To the extent permitted by law

OUR PRACTICES ON AND OFF THE FIELD

GUIDING YOUR BEHAVIOR

The following questions should be used to guide an individual's behavior when working for and/or representing U.S. Soccer:

- Is it consistent with the Code?
- Is it ethical?
- Is it legal?
- Will it reflect well on me and U.S. Soccer?

If the answer is "NO" to any of these questions, DON'T DO IT.

The key principles of the Code and the FIFA code of Ethics are complemented and developed by the implementing policies referenced throughout this code and other policies, procedures and standards implemented by U.S. Soccer from time to time.

We all must follow the law, act with integrity in all matters, respect others, and be accountable for our actions.

CODE OF CONDUCT PILLARS

ANTI CORRUPTION

U.S. Soccer team members must comply with all relevant anti-corruption laws and adhere to the relevant international standards wherever we do business. Corrupt activities a violation of the Code and the FIFA Code of Ethics, can result in violations of anti-corruption laws and result in personal criminal liability.

U.S. Soccer team members shall not receive, offer, promise to pay, authorize the payment of a bribe, monetary or VIK to any individual (including without limitation any government officials, candidates for office, FIFA, Concacaf or USOPC officials, coaches, referees or private individuals) with the intent to receive favorable treatment, obtain or retain business, secure an improper advantage, or influence official actions or decisions.

Prior to providing anything of value, i.e. gift to a government official the U.S. Soccer team member must receive approval from U.S. Soccer Legal.

MATCH INTEGRITY

As the recognized National Governing Body (NGB) by the USOPC for the sport of Soccer in the United States it is the responsibility of U.S. Soccer to act to preserve the integrity of any soccer match we organize or in which we participate. U.S. Soccer strictly prohibits participation in betting, gambling, daily fantasy, or any event or transaction related to wagering on the outcome of a match, any event occurring on the pitch, or any soccer-related activities.

U.S. Soccer does not tolerate any form of manipulation or unethical influencing of match results and we charge all U.S. Soccer team members with reporting any suspected concerns regarding match integrity.

In addition, we follow the FIFA Code of Ethics, which provides that persons bound by this Code shall be forbidden from taking part in, either directly or indirectly, or otherwise being associated with, betting, gambling, lotteries and similar events or transactions connected with football/soccer matches. They are forbidden from having stakes, either actively or passively, in companies, concerns, organizations, etc. that promote, broker, arrange or conduct such events or transactions.

AVOIDING CONFLICTS OF INTEREST

In accordance with the U.S. Soccer Conflict of Interest Policy (COI) team members must avoid all conflicts of interest. A conflict of interest exists when a personal interest, activity or relationship with an outside organization² interferes or appears to interfere with the duties that you perform at, or owe to, U.S. Soccer. A conflict of interest may unconsciously influence even the most ethical person and the mere appearance of a conflict may cause a partner's acts or integrity to be questioned. Where a conflict, it is cannot be³ avoided, it is managed through disclosure and where, appropriate, recusal (e.g., a Board member recuses him or herself from decisions regarding a contract between U.S. Soccer and that Board member).

U.S. Soccer has a Conflict of Interests Policy that requires any conflicts of interest, whether actual or apparent, be reported promptly to the legal department and/or the RAC Committee. A copy of the Conflict of Interest Policy is available from the legal department.

Without limiting any of the information in this section, team members are subject to the conflict of interest policy, including its mandatory reporting of conflicts.

POLITICAL ACTIVITIES

U.S. Soccer and its representatives comply with all federal, state and local laws governing participation in government relations and political activities.

U.S. Soccer funds or resources are not contributed to individual political campaigns, political parties, or other organizations that intend to use the funds primarily for political purposes. U.S. Soccer does not permit any political literature, campaign materials or politically orientated information, materials, posters, signs, or buttons to be displayed, circulated or otherwise present on U.S. Soccer property or in the course of conducting work for the U.S. Soccer.

You may, of course, participate in the political process on your own time and at your own expense, so long as you do not give the impression that you are speaking on behalf of or representing the U.S. Soccer in such activities. Nor can you be reimbursed by the U.S. Soccer for any personal contributions for such purposes. If you are seeking public office, you may use vacation time or request leaves of absence to campaign or hold office. The U.S. Soccer will not make contributions to any political candidate or party.

GIFTS, MEALS AND ENTERTAINMENT

Do not accept gifts, meals or entertainment, or any other favor, from corporate partners or suppliers if doing so might compromise, or appear to compromise, your ability to make objective business decisions in the best interest of U.S. Soccer.

You may keep unsolicited gifts, favors, or gratuities with a value of less than \$150, but for any such items with a value in excess of \$50, you must fully disclose in writing to the legal department or the RAC Committee the donor, purpose and amount of such gift, favor or gratuity.

You may accept occasional meals and entertainment from a corporate partner, member, or supplier if the event is attended by the corporate partner, member, or supplier, and the costs involved are in line with local custom for business-related meals and entertainment. For example, ordinary business meals and attendance at *local* sporting events (i.e. not the World Cup^{TM}) also attended by the corporate partner, member, or supplier generally are acceptable.

² Because of the unique nature of U.S. Soccer's representative model of governance which comprised of representatives of its constituent members, "outside organizations" do not include constituent or affiliated member entities of U.S. Soccer except to the extent required by applicable law

TICKETS AND HOUSING FOR PERSONAL USE

Tickets to sporting events or other entertainment venues that are offered by a partner or supplier for your personal use, without attendance by the partner or supplier, are considered gifts. They should not be accepted, unless offered to a large group of employees as part of an agreement between U.S. Soccer and the partner or supplier. The same is true of personal use of a condominium or vacation home, or personal travel on a private aircraft.

ACCURACY OF CORPORATE RECORDS, FINANCES AND FINANCIAL REPORTING

Ensure the accuracy of all U.S. Soccer business and financial records. These include not only financial accounts, but other records such as game reports, time records, expense reports and submissions such as benefits claim forms and resumes.

Ensuring accurate and complete business and financial records is everyone's responsibility, not just a role for accounting and finance personnel. Accurate recordkeeping and reporting reflects on U.S. Soccer's reputation and credibility, provides appropriate transparency to our members, and ensures that the U.S. Soccer meets its legal and regulatory obligations.

USE OF U.S. SOCCER ASSETS

U.S. Soccer is a not-for-profit corporation, and so all of us share a duty to our mission. We expect all U.S. Soccer team members to serve this mission by protecting U.S. Soccer assets and using those assets in the manner intended.

- Do not engage in personal activities during work hours that interfere with or prevent you from fulfilling your job responsibilities.
- Do not use U.S. Soccer computers and equipment for outside businesses, or for illegal or unethical activities such as gambling, pornography or other offensive subject matter.
- Do not take for yourself any opportunity for financial gain that you learn about because of your position at U.S. Soccer, or through the use of U.S. Soccer property or information.

The use of U.S. Soccer assets outside of your U.S. Soccer responsibilities—such as using your U.S. Soccer work product in an outside venture, or using

U.S. Soccer materials or equipment to support personal interests—requires prior written approval from each of your executive manager of your function and the Chief People and Diversity Officer. You must have this approval renewed annually if you continue to use the asset outside of work.

WORKING AS A TEAM

HOW WE TREAT ONE ANOTHER

Soccer is a global game that unites us all. U.S. Soccer promotes equal opportunity in its hiring practices, makes recruiting decisions based solely on job-related criteria and does not use forced labor.

When dealing with minor athletes (anyone under 18), we comply with the Safe Soccer Framework.

At U.S. Soccer, we treat each other with respect and dignity. This means we raise our criticism constructively, acknowledge that professional disagreements may nonetheless exist, and understand that all team members are entitled to work in an environment that is free of harassment, bullying or unlawful discrimination.

Please see U.S. Soccer's Prohibited Conduct Policy for more information.

HOW WE WORK WITH OTHERS

We conduct all member, corporate partner, supplier, vendor and other business relationships in a fair, equitable, ethical and legal manner consistent with the Code, all applicable law and good business practices. Decisions to hire or engage a vendor or supplier should be made on the basis of objective criteria, and not on the basis of personal relationships, friendships or the opportunity for personal gain, financial or otherwise.

AVOIDING ILLEGAL DRUGS AND ALCOHOL

We follow U.S. Soccer Anti-Doping Policy and the USOPC's National Anti-Doping Policy and therefore maintain strict standards regarding substance abuse. You also may not use or possess illegal drugs or controlled substances on U.S. Soccer property or while you are engaged in any job-related activity.

Team members may not report to work under the influence of alcohol, illegal drugs or controlled substances.

SAFE SOCCER FRAMEWORK

U.S. Soccer has zero tolerance for abuse or misconduct of any kind. As part of our commitment to serving our youth athletes, coaches and referees, U.S. Soccer has created a Safe Soccer Framework which represents a foundational structure for building a soccer community where all participants, be they athletes, coaches, referees, parents, administrators or volunteers, play an active role in creating a soccer atmosphere free of all forms of emotional, physical and sexual misconduct.

In keeping with U.S. Soccer's on-going commitment to athlete safety, in addition to the Safe Soccer, U.S. Soccer posts the following information on its website for 24/7 access:

- U.S. Center for SafeSport Code and link to Reporting Information
- U.S. Soccer's Integrity Hotline reporting resource
- Educational and prevention resources
- The Safe Soccer Framework HERE.

PROTECTION OF RESOURCES AND INFORMATION

PRIVACY AND CONFIDENTIALITY

U.S. Soccer's information assets are valuable to the organization and we diligently protect from loss, theft, inadvertent or unauthorized disclosure or misuse. U.S. Soccer information, whether stored in computers, files or elsewhere.

Team members must not discuss with or disclose to any unauthorized persons inside or outside U.S. Soccer any information that is confidential or not publicly available. This is particularly true when dealing with personal information of our members, our athletes and our fans, which information should only be used in accordance with the applicable privacy policy.

U.S. Soccer business should not be discussed with unauthorized persons. Team Members should be careful about discussing U.S. Soccer information and activities in the presence of, or within hearing distance of, unauthorized personnel. You should also not seek or accept any information to which you and U.S. Soccer are not legitimately entitled, regardless of the source. If you are contacted by a member of the media, you must refer the inquiry to the Communications department before responding on behalf of U.S. Soccer.

Your obligations to maintain the confidentiality and protection of U.S. Soccer information does not end even if employment or other relationship with the U.S. Soccer ends.

INTELLECTUAL PROPERTY

Our crest stands for the honor of representing the National Team on the pitch, and we expect all U.S Soccer team members to support the protection of U.S. Soccer intellectual property. Contact U.S. Soccer's legal department regarding any anticipated use of intellectual property that does or may belong to someone else.

ADMINISTRATION OF THIS CODE

ADMINISTERS OF THE CODE

All team members are responsible for administering the Code in their everyday U.S. Soccer related activities. U.S. Soccer department of Human Resources and Legal to the extent applicable, the Risk and Audit Committee of the Board of Directors. are responsible for administering the code and receiving possible code violations along with initiating the investigation and follow-up resolution required.,

RAISING CONCERNS WITHOUT RETALIATION

U.S. Soccer charges all team members with the responsibility of promoting integrity, respect and accountability. If we observe or suspect, in good faith, any violation of this Code, we must act to report the issue–reporting avenues will be outlined in this document. U.S. Soccer handles reports of misconduct confidentially to the extent reasonably practicable and legally permissible. We will investigate the matter where needed, make a determination whether the Code or the law has been violated, and take appropriate corrective action as appropriate.

U.S. Soccer values the help of team members who identify potential problems of misconduct that need to be reviewed. U.S. Soccer does not tolerate retaliation in any form against individuals who report violations of this Code in good faith or otherwise support any investigation of such a violation.

U.S. Soccer will protect any team member who raises a concern honestly, but it is a violation of the Code to knowingly make a false accusation, lie to investigators, or interfere or refuse to cooperate with a Code investigation. Honest reporting does not mean that you have to be right when you raise a concern; you just have to believe that the information you are providing is accurate.

REPORTING CODE OF CONDUCT CONCERNS

The following outlines reporting of Code of Conduct concerns for investigation and resolution.

- Calling the Integrity hotline (312) 528-7004⁴
 - Reports submitted to this Integrity Hotline will be handled as promptly and discreetly as possible, with facts made available only to those who need to investigate and resolve the matter
- Web based reporting https://www.ussoccer.com/integrity-hotline
- ATHLETES USOPC Athletes Ombuds
- Report to Chief People and Diversity Officer of U.S. Soccer
- Report to Chief Legal Officer of U.S. Soccer

⁴ Although you may always use the Integrity Hotline confidentially, in the event you make a report of suspected child abuse to law enforcement, the U.S. Center for SafeSport, or another authority, we encourage you not to make an anonymous report simply because an anonymous report will not provide you with evidence that you discharged your mandatory reporting obligation.

For U.S. Soccer employees and independent contractors - reporting to direct manager

U.S. Soccer is committed to safeguarding the confidentiality of individuals who submit reports. In the event U.S. Soccer receives a report of suspected child abuse triggering a reporting obligation under the Safe Soccer Framework and applicable federal law, we will make the report directly and/or work with you to make the report.

INVESTIGATION OF POTENTIAL CODE VIOLATIONS

U.S. Soccer takes all reports of potential Code violations seriously and is committed to confidentiality and investigation of allegations. The investigation of Code violations and any required follow-up will be conducted and executed by disinterested parties.

Employees who are being investigated for a potential Code violation will have fair notice and an opportunity to be heard prior to any final determination. U.S. Soccer reserves the right to take all available disciplinary and/or remedial measures for violation of this Code.

RESOLUTION

U.S. Soccer will investigate all possible Code violations to the extent offered by law and its jurisdiction and abilities. U.S. Soccer will engage with the proper authorities and personnel including but not limited to FIFA, Center of SafeSport, the Risk, Audit and Compliance Committee of the Board the proposed violation require. Once a resolution has been reached all parties involved will be informed of the final outcome of the investigation, actions taken and follow-up required.