USO CODE OF CONDUCT

Conflict of Interest

USO respects and supports the rights of individuals to engage in social, community, political, and religious activities; however, as individuals, USO employees may not represent USO in any such activities. It is essential that all USO representatives avoid influence from outside business and personal relationships on decisions or activities affecting USO. In all business transactions whether for themselves or on behalf of USO, employees must not allow themselves to be placed in a conflict between their self-interest and that of USO. Employees must not only avoid situations that give rise or could give rise to a conflict of interest, but also situations that create the appearance of a conflict of interest.

Employees must avoid making any investments or entering into any other relationships that might conflict with their responsibilities to USO. Acceptance of gifts, fees, or commissions, entertainment or favors from contractors, consultants, suppliers, or someone seeking such business advantages is prohibited. Offers to an individual of cash donations should be referred to the USO Development Department.

At the time of hire, all employees will be notified of this policy and shall have the obligation to disclose any perceived or real area of potential or actual conflict of interest. At least annually, all required employees must complete a restatement of compliance.

Subsequent to hire, and for the duration of their employment with USO, all employees are obligated to disclose any area of potential or actual conflict of interest. Such disclosure should be made to the appropriate executive officer and the Senior Vice President, Global Human Resources. All information disclosed will be treated on a confidential basis. Failure to report such incidents will be considered sufficient justification for immediate dismissal from employment.

USO employees should strive to avoid situations in which their personal interest may conflict with that of USO or give the appearance of impropriety. No employee should allow his own personal interest to conflict with that of USO in connection with transactions affecting USO. Where a potential conflict of interest may exist, the involved employees are prohibited from approving the conflicted transaction. Consequently, each employee must avoid situations, relationships, and interests, either directly or indirectly, in which he/she might be influenced to favor himself/herself, family members, or others at the expense of USO or any of its operations.

A “family member,” for the purpose of this policy, includes a close relative (by blood or marriage) and also any person living in the same household as the employee, or any person dependent on the USO employee.

“Conflict of interest” will generally mean:

A situation, relationship, or interest where the incentive, actual or potential, direct or indirect, financial or otherwise, to act or behave in a manner inconsistent with the objectives and interests of USO is more than insignificant; or

The ability of the employee to maintain his/her duty of loyalty as an employee of USO, applying objective standards, is compromised by such employee’s relationship to, or interest in, any organization or person whose interests and objectives are in conflict, or in competition with, those of USO.
Conflict of Interest

“Appearance of impropriety” shall generally mean a situation, relationship, or interest, irrespective of value or degree, which, to an objective observer, could or would reasonably create an impression that a conflict or a level of influence or involvement exists, which impression is contrary or detrimental to the objectives and interests of USO.

As noted, the foregoing definitions are intended as guidelines by which matters are to be evaluated. Each relationship and interest must be examined in context on its own merits.