Panam Sports Compliance Policy

POLICY ADOPTION, TERM, AND APLICABILITY

Policy Adoption: This Panam Sports Compliance Policy (the "Policy") was adopted by the Panam Sports Executive Board at its meeting on November, 2016.

Policy Term: This policy will remain in effect unless and until revised or abolished by formal action of the Panam Sports Executive Board.

Policy Applicability: The Policy governs all of Panam Sports, its paid and volunteer administration and officials including without limitation its staff, Executive Board members, Commission and Working Group members.

Policy Questions, Concerns: Should you have a question or concern about the Policy or its application to a particular circumstance you may contact the Panam Sports Secretary General for assistance.

POLICY FUNDAMENTAL PRINCIPLE

We are committed to the Fundamental Principles of Olympism

Panam Sports is an unconditional supporter of Olympism and the Olympic Movement. The values and principles enshrined in the Olympic Charter underlie all that Panam Sports does. To act contrary to them is the antithesis of all that Panam Sports stands for.

Panam Sports cannot and will not tolerate its paid and volunteer administration and officials including without limitation its staff, Executive Board members, Commission and Working Group members acting in violation of the Olympic Charter, the Panam Sports Constitution or Panam Sports Code of Ethics, the ANOC Code of Ethics, the IOC Code of Ethics, or their implementing provisions or policies. Acting in compliance with them is the only permissible course of action, no matter the cause for any violation.

POLICY SPECIFICS

1. We are committed to good governance

Panam Sports adopts and is committed to respect for the Basic Universal Principles of Good Governance of the Olympic and Sports Movement, including without limitation:

- transparency
- responsibility
- accountability

It is required and expected that all Panam Sports operations and activities in which it engages will honour these Principles of Good Governance.

2. We are committed to integrity – no corruption

Panam Sports will not tolerate corruption.

Corruption is contrary to Olympism. In addition, many countries treat corruption as a crime, regardless of whether the actual act takes place in their jurisdiction or in another country. Consequently, Panam Sports shall stand strongly against and firmly sanction any corrupt activities.

Thus, Panam Sports' paid and volunteer administration and officials including without limitation its staff, Executive Board members, Commission and Working Group members are strictly prohibited from engaging in or attempting to engage in any conduct in contravention of the Olympic Movement Code on the Prevention of the Manipulation of Competitions, the World Anti-Doping Code, or any other form of corruption.

Panam Sports will not entertain any business dealings, or the awarding of any Games, hosting rights for a General Assembly, or other Panam Sports event, that involve the violation of any applicable laws or Panam Sports policies or rules relating to the granting or acceptance of favors.

The granting or acceptance of gifts must take place in compliance with the law as well as Panam Sports' Code of Ethics. In any situation where stricter rules and laws apply, then they must be observed as well.

A gift or advantage can take many forms. Examples include: cash, invitations to events, airline tickets, hotel stays, employment or a contract for oneself, a friend or relative, special personal favors and even the provision of lavish food or drink. Prohibited gifts include those given indirectly to, for example, friends, relatives or associates.

Panam Sports' paid and volunteer administration and officials including without limitation its staff, Executive Board members, Commission and Working Group members are not allowed, under any circumstances, to demand personal gifts in connection with the performance of their duties. Likewise, they may not offer or grant gifts of cash, or gifts equivalent to cash, to any private individual or public official.

In all of their dealings, Panam Sports' paid and volunteer administration and officials including without limitation its staff, Executive Board members, Commission and Working Group members must avoid granting or accepting any gifts in connection with the negotiation, award or performance of a contract or in the awarding of any Games, hosting of a General Assembly or other Panam Sports event. Any gift granted or accepted must be of a size deemed unobjectionable under the laws applicable to both the giver and the recipient. In case of doubt, please contact the Panam Sports Secretary General.

Panam Sports paid and volunteer administration and officials including without limitation its staff, Executive Board members, Commission and Working Group members are strictly prohibited from unlawfully influencing, or attempting to unlawfully influence Panam Sports business partners, whether through favors, gifts, or the granting of other advantages, anywhere in the world. This prohibition particularly applies to dealings with individuals acting on behalf of government agencies or other public institutions. Equally, Panam Sports paid and volunteer administration and officials including without limitation its staff, Executive Board members, Commission and Working Group members must not permit themselves to be influenced, or appear to be influenced, through the acceptance of favors, gifts, or the granting of other advantages from those who do or seek to do business with Panam Sports or seek some other benefit from Panam Sports such as to hold a Pan American Games, General Assembly, or other event.

3. We are committed to the principle of sustainability – with respect to both human health and the environment

Panam Sports is committed to:

- Protecting the environment and the health and safety of its employees and all those who in any way participate in its activities. This is extremely important to the way Panam Sports conducts its business.

- Sustainable development.

3.1 Environmental protection

Panam Sports believes in making its contribution to sustainable development through the efficient use of the resources it consumes. Panam Sports paid and volunteer administration and officials including without limitation its staff, Executive Board members, Commission and Working Group members are expected to explore all reasonable opportunities to limit consumption in order to reduce the consumption of energy and the equipment, materials and supplies Panam Sports uses.

3.2 Work safety

Employees who work in Panam Sports offices must be properly trained, and be properly supervised, and never put in a position of working in an unsafe working environment.

3.3 Occupational health and safety

Maintaining the health of our employees is in everyone's – the employees' and Panam Sports' – best interests. All necessary and reasonable steps must be taken to prevent accidents and illness owing to or arising from the employee's workplace or work.

Employees share in the responsibility for occupational safety in the workplace. Sometimes accidents occur because we become less careful.

Extreme care must be exercised when dealing with potential sources of danger. Every employee and Panam Sports volunteer must strictly and constantly observe all safety rules in his or her respective workplace: for his or her personal benefit, and for the benefit of colleagues and Panam Sports as a whole.

When an incident occurs, the responsible supervisor must immediately notify all required persons and agencies, and must immediately take all reasonable steps to mitigate the harm to the employee and workplace.

4. We are committed to respecting confidentiality

All of Panam Sports' paid and volunteer administration and officials including without limitation its staff, Executive Board members, Commission and Working Group members are required to maintain the confidentiality of any non-public information about Panam Sports and its dealings that is of a confidential nature.

Using such confidential or inside information of Panam Sports for personal gain or the gain of others is prohibited.

5. We are committed to proper record-keeping and transparent financial reporting – no deception

An internal control system must provide for proper documentation of an entity's key business processes and the establishment of controls to ensure that all transaction details relevant for accounting purposes are fully and correctly captured.

Files must therefore be complete, orderly and readily understandable. All records and files must be kept in such a way as to permit delegation to a colleague at any time. Employees and individuals holding Panam Sports volunteer positions possessing Panam Sports internal records and files must retain records for as long as statutory or internal provisions require, and must never destroy documents relevant to threatened, prospective, or pending official or judicial proceedings.

Any item of correspondence, whether a letter, fax, email or even verbal comment, must be communicated in observance of proper etiquette and be clear and consistent in content so that it can be presented or delivered to a third party (such as an investigative body, court of law, other governmental institutions or certified public accountants). Comments attributable to Panam Sports that are inappropriate, unclear, incomplete, or made in haste may be extremely damaging because they can be misinterpreted, misused, or taken out of context. Employees and individuals holding Panam Sports volunteer positions must be courteous and professional when using email and other forms of online communication.

The following additional guidelines are essential for ensuring accurate and timely financial reporting:

All items with accounting relevance must be supported by complete and correct documentation and entered into the books accordingly. Panam Sports' accounting records and related documents must fully and accurately reflect all financial transactions and give a true and fair view of Panam Sports' assets and liabilities.

Every one of Panam Sports' paid and volunteer administration and officials including without limitation its staff, Executive Board members, Commission and Working Group members tasked with presenting information that is relevant to Panam Sports' financial reporting is responsible for ensuring that this information is complete and accurate. Employees and individuals holding a Panam Sports volunteer position must promptly notify the Panam Sports Secretary General in any instance where they have reason to doubt whether financial transactions have been correctly presented in financial reporting.

Panam Sports' annual audited financial statements are to be prepared in accordance with International Financial Reporting Standards.

Panam Sports will be guided by the principles of full disclosure and transparency in its financial reporting to its members.

6. We are committed to fair and respectful working conditions – no discrimination – no harassment

No person is to be unfairly treated, disadvantaged, favored, harassed, or ostracized because of race, religion, politics, gender, sexual orientation, or other protected class in the particular country where a Panam Sports activity is taking place.

Everyone has the right to be protected against discrimination and harassment of any kind whether within Panam Sports or in Panam Sports' dealings with outside parties.

Panam Sports expects its employees and individuals holding Panam Sports volunteer positions to be courteous objective, fair and respectful in their dealings with colleagues and third parties. By doing so, they also make an active contribution toward protecting Panam Sports' good reputation.

The responsibility for maintaining these standards of conduct rests with each and every employee and individual holding a Panam Sports volunteer position. Any violation must be referred to Panam Sports Secretary General, or in the case of the Secretary General's involvement in the violation, to the President, who if necessary, will take the required action to appropriately address any wrongdoing and to prevent a repeat violation.

7. We are committed to keeping Panam Sports and personal interests separate – avoidance of conflicts of interest

Panam Sports paid and volunteer administration and officials including without limitation its staff, Executive Board members, Commission and Working Group members must separate their own personal interests from those of Panam Sports.

Conflicts of interest – and even the mere appearance of such conflicts – must be avoided. A list of typical areas of conflict is given below. Where a conflict appears likely, Panam Sports paid and volunteer administration and officials including without limitation its staff, Executive Board members, Commission and Working Group members should disclose the conflict and seek assistance from the Panam Sports Secretary General.

- Personnel decisions: A person's own individual interests or relationships must not influence personnel decisions.

- Business relationships with third parties: Business relationships with third parties must be formed on the basis of objective criteria (for example, price, quality, reliability, technological standard, trust worthiness and capacity to deliver, existence of a long-standing and trouble-free business relationship).

- The execution of a contract or continuation or termination of a business relationship with a third party must not be influenced by personal relationships, personal interests or tangible or intangible personal advantages. The supply of products or provision of services to Panam Sports by companies that are controlled by Panam Sports paid and volunteer administration and officials including without limitation its staff, Executive Board members, Commission and Working Group members, or their close relatives, must be subject to close scrutiny and generally avoided.

- Contracting of suppliers or other business partners of Panam Sports for personal purposes: If one of Panam Sports' paid and volunteer administration and officials including without limitation its staff, Executive Board members, Commission and Working Group members wishes to place a personal supply or other business contract with a person or entity that also has a pre-existing business relationship with Panam Sports and that employee or individual holding a Panam Sports volunteer position is in a position to directly or indirectly influence Panam Sports' business relationship with the supplier or business partner in question, which includes Pan American Games Organizing Committees and Organizing Committees of Panam Sports General Assemblies or other events, the employee must notify the Panam Sports Secretary General and receive the Secretary General's permission before placing the contract.

- Using the services of Panam Sports employees for personal purposes: Panam Sports paid and volunteer administration and officials including without limitation its staff, Executive Board members, Commission and Working Group members may not abuse their authority by availing themselves of the services of Panam Sports employees for personal purposes.

- Use of Panam Sports property (for example, equipment, goods, vehicles, office supplies, documents, files, data storage media): Employees and individuals holding Panam Sports volunteer positions may not use items belonging to Panam Sports for their own personal purposes or remove such items from Panam Sports' premises or control without the Secretary General's express consent. Likewise, no data, programs or Panam Sports papers may be copied or removed from Panam Sports' premises or control without approval from the Secretary General.

- Use of the Internet and email system: Panam Sports provides Internet access and electronic communications for business purposes. Occasional, minimal use of the business Internet connection for private purposes during individual breaks is permitted. This permission may be revoked at any time. Private Internet use must be strictly limited in duration and must not interfere with an employee's duties. Use of the email system provided by Panam Sports is for business purposes only. The email system must not be used for private purposes.

- Personal involvement in political parties or other sport, social or political institutions: Panam Sports welcomes its employees' and individuals holding Panam Sports volunteer positions voluntary involvement in such organizations, and employed positions in the case of individuals holding Panam Sports volunteer positions, as long as it does not interfere with the performance of their duties for Panam Sports.

- Public expression of personal opinions by Panam Sports paid and volunteer administration and officials including without limitation its staff, Executive Board members, Commission and Working Group members: When expressing their personal opinions in public, employees and individuals holding Panam Sports volunteer positions must carefully avoid creating or fostering any impression that these opinions represent the views of Panam Sports.

8. We are committed to cooperating with our sport partners and with the authorities – no misinformation

Panam Sports endeavors to be cooperative in its dealings with all sport partners and with authorities and government agencies while at the same time defending its own interests and rights.

Panam Sports paid and volunteer administration and officials including without limitation its staff, Executive Board members, Commission and Working Group members responsible for collecting company information and communicating to others or for the purpose of public announcements should communicate such information completely, openly, correctly, in a timely manner and understandably.

POLICY APPLICATION

Panam Sports paid and volunteer administration and officials including without limitation its staff, Executive Board members, Commission and Working Group members must adhere to this Panam Sports Compliance Policy. It is intended to protect both Panam Sports and its employees, and individuals holding Panam Sports volunteer positions.

This policy defines the framework within which Panam Sports paid and volunteer administration and officials including without limitation its staff, Executive Board members, Commission and Working Group members can act with confidence and directly benefits them by, among other things, safeguarding them from discrimination and establishing rules for the conduct of Panam Sports' business. Its observance therefore is in the best interest of Panam Sports' paid and volunteer administration and officials including without limitation its staff, Executive Board members, Commission and Working Group members both as individuals and as important contributors to Panam Sports' success.

Everyone who is part of Panam Sports' paid and volunteer administration and officials including without limitation its staff, Executive Board members, Commission and Working Group members is called upon to

review his or her own behavior in light of the standards set forth in this Panam Sports Compliance Policy and to ensure that these standards are observed.

Panam Sports paid and volunteer administration and officials including without limitation its staff, Executive Board members, Commission and Working Group members should bear in mind that there are specific laws and internal policies that address in greater detail the topics discussed here. Employees and individuals holding Panam Sports volunteer positions are required to familiarize themselves with the applicable laws and Panam Sports internal policies governing their areas of engagement and to follow these laws and policies in their daily work or other Panam Sports engagement. Any ambiguities should be clarified by the employee or individual holding a Panam Sports volunteer position before acting.

Each member of Panam Sports' paid and volunteer administration and officials including without limitation its staff, Executive Board members, Commission and Working Group members is expected to set an example through his or her conduct by acting with integrity and thereby ensuring that compliance is internalized as a fundamental part of Panam Sports' culture.

All of Panam Sports' paid and volunteer administration and officials including without limitation its staff, Executive Board members, Commission and Working Group members are required to immediately report any violations of the Panam Sports Code of Ethics.

The principles set out in this Panam Sports Compliance Policy are implemented in the Panam Sports Code of Ethics and other Panam Sports policy and compliance documents. The Panam Sports Code of Ethics includes a requirement that any Panam Sports employee or volunteer must report Code violations.

When members of Panam Sports' paid and volunteer administration and officials including without limitation its staff, Executive Board members, Commission and Working Group members suspect corruption or the intentional mishandling of Panam Sports property or finances, for example, embezzlement, fraud, breach of trust or the offering or acceptance of bribes, they should report the matter without delay.

Promptly reporting this kind of information is likely to save Panam Sports from suffering additional, more serious harm or at least mitigate the damage, and importantly bring the wrongdoing to an end as soon as possible.