



Code of Conduct Policy
Date of Issuance: December 2021

Purpose:

USA Archery (“USAA”) has adopted this Code of Conduct to support its Mission and Core Values with the expectation that the people who work for, or on behalf of, USAA shall conduct themselves consistent with same.

I. Introduction

Mission: The mission of USA Archery is to provide the necessary resources to foster strong athlete participation, competition, and training in the sport of archery.

II. Applicability

This Code of Conduct applies to all employees, contractors, volunteers, board members, officers, committee, advisory council and task force members, hearing panel members, contractors, club members, affiliated organizations, and individual members of USAA (collectively, “you”).

III. Reporting Obligations

No code of conduct can address every situation, nor can it take the place of good judgment and integrity. USAA maintains an “open door” for anyone who has questions or concerns. If you need advice or assistance concerning the application of any aspect of these standards, consult your supervisor or manager (if applicable), USAA’s Chief Executive Officer (“CEO”), or the Chair of the Ethics Committee. You are expected to seek advice and clarification promptly when you are uncertain about proper actions or practices.

You have an obligation to report potential or actual violations of this Code of Conduct to your supervisor or manager (if applicable), the CEO at ceo@usarchery.org, the Chair of the Ethics Committee at ethics@usarchery.org, or any other designated reporting authority identified by USAA from time to time.

Under no circumstances will an individual be subject to any disciplinary or retaliatory action for filing, in good faith, a report of a violation or potential violation of the Code of Conduct. However, filing known false or malicious reports will not be tolerated, and anyone filing such reports will be subject to appropriate disciplinary action. For additional information on this topic, please consult USAA’s Whistleblower Policy.

IV. Legal Compliance

USAA requires that you follow the Code of Conduct and abide by all applicable USAA and United States Olympic & Paralympic Committee rules, policies, and procedures; United States federal, state, and local law as applicable, including the Ted Stevens Olympic and Amateur Sports Act, codified at 36 U.S.C. §§ 22501 – 22529; the U.S. Center for SafeSport Code, and foreign law as applicable. If you ever encounter a conflict of law, such as a conflict between United States and foreign law or have any questions about the legality of any action, contact the CEO: ceo@usarchery.org for further information and guidance.

V. Code of Ethics

The promotion of an ethical workplace free from misconduct allows the USAA to focus on its Mission. To that end, the USAA Ethics Committee and staff develop implement policies and procedures to equip USAA members with guidance and resources to successfully navigate Code of Ethics and Code of Conduct-related issues.

VI. Commitment to Integrity

USAA is committed to honesty and integrity as the cornerstone of our activities. In turn, USAA expects you to conduct yourself in an ethical and legal manner as a representative of USAA. This requires that you:

- Respect the rights of all individuals to fair treatment and equal opportunity, free from discrimination or harassment of any type, including, without limitation discrimination on the basis of race, color, religion, sex, sexual orientation, disability, gender identity, age, national origin, pregnancy, childbirth or related medical conditions, genetic information, veteran status, or any other characteristic protected under applicable federal, state, or local law.
- Know, understand, and comply with all applicable laws, regulations, and codes of conduct.
- Ensure that all USAA work and transactions are handled with honesty, integrity, and recorded accurately.
- Recognize that even the appearance of misconduct or impropriety can be very damaging to the reputation of USAA and act accordingly.

USAA recognizes that wagering on the Olympic, Paralympic, and other USAA-sanctioned events and on athletes where they are participating in those events, for example sports book bets and fantasy sports programs that have the possibility of valuable winnings (“Olympic/Paralympic Wagering”), is legal and regulated in the State of Nevada and in a number of foreign jurisdictions. At the same time, it is critical to the avoidance of actual and/or apparent conflicts of interest and to the overall integrity of the Olympic and Paralympic Movement that no person involved in the Movement promote, support, or otherwise engage in Olympic and Paralympic Wagering. Thus, you must at all times refrain from directly or indirectly:

- 1.Engaging in Olympic and/or Paralympic Wagering;
- 2.Promoting Olympic and/or Paralympic Wagering;
- 3.Facilitating or otherwise supporting Olympic and/or Paralympic Wagering;
- 4.Knowingly sharing confidential athlete, team, or competition information with a person or entity involved in Olympic and/or Paralympic Wagering; or
- 5.Attempting to influence the course or result of any competition in connection with Olympic and/or Paralympic Wagering

If anyone approaches you about engaging in items 1-5 above, you have an obligation to disclose this, as set out in Section III above.

VII. No Abuse and SafeSport

USAA finds sexual, emotional, and physical abuse intolerable and in direct conflict with Olympic and Paralympic ideals. To that end, USAA has a USAA Safe Sport Policy and adopted the U.S. Center for Safe Sport Code which may be found on USAA's website at www.usarchery.org.

You have a duty to report any alleged sexual, emotional, or physical abuse occurring in the workplace or at any USAA supported training facility or activity, club or sanctioned event as set forth in USAA's Safe Sport Policy (including, but not limited to the Minor Athlete Abuse Prevention Policy) and U.S. Center for SafeSport Code to athletesaftey@usarchery.org or to the U.S. Center for SafeSport at <https://uscenterforsafesport.org/report-a-concern/>.

VIII. Conflicts of Interest

USAA has instituted a Conflict of Interest Policy that requires that any conflicts of interest, whether actual or apparent, be reported promptly to the Ethics Committee. A copy of the Conflict of Interest Policy may be found on USAA's website at www.usarchery.org.

IX. Complaints, Investigation, and Disposition

By becoming a USAA member, you are subject to and may submit a complaint under USAA's Bylaws and Disciplinary Proceedings and Grievance Policy, USAA's Safe Sport Policy and Background Screen Criteria and Review Policy and USAA's Whistleblower Policy. A copy of these policies may be found on USAA's website at www.usarchery.org.

Individuals may submit complaints to the following:

- Administrative and Right to Compete Complaints may be sent to the USAA CEO and the Chair of the Board of Justice at complaints@usarchery.org
- Ethics Complaints may be send to the Chair of the Ethics Committee at ethics@usarchery.org
- Safe Sport Complaints may be sent to USA Archery at athlete safety@usarchery.org or Report to the U.S. Center for SafeSport at: <https://safesport.org/report-a-concern>

Complaints will be addressed as follows:

Per the USAA Disciplinary Proceedings and Grievance Policy, the Board of Justice will appoint a hearing panel, which includes 33% athlete representation. All parties on the hearing panel will be required to be disinterested and free from conflicts of interest.

X. Personal Use of Organization Resources

It is the responsibility of employees, volunteers, and independent contractors to protect and preserve USAA's resources, including USAA intellectual property. If you have a question about use of any USAA resources, you should consult the employee manual and/or contact your supervisor (if you are a USAA

employee) or the CEO at ceo@usarchery.org. You should report any improper use of USAA resources to your supervisor (if applicable) or the CEO: ceo@usarchery.org.

XI. Political Activities and Contributions

USAA and its employees, volunteers, and independent contractors must comply with all federal, state, and local laws governing participation in government relations and political activities when acting in an official USAA capacity. Additionally, USAA 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. USAA also 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 USAA's property or while conducting work for USAA. There are some very limited exceptions to this policy. At times, USAA may ask individuals to make personal contact with government officials or to write letters to present USAA's position on specific issues. Before doing so, you should confirm with the CEO that such contact is authorized and in compliance with this policy, and that you are knowledgeable on the specific issues about which you have been asked to speak. 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 USAA in such activities. Nor can you be reimbursed by USAA 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. USAA will not make contributions to any political candidate or party. This policy is required by the Ted Stevens Olympic and Amateur Sports Act, the Internal Revenue Code and other applicable law. You should contact the CEO at ceo@usarchery.org if you have any questions or concerns regarding these requirements.

XII. USAA Information

All USAA employees, volunteers, and independent contractors are responsible for the integrity and accuracy of organization documents, communications, and financial records. All financial information must reflect actual transactions and conform to generally accepted accounting principles. It is a violation of the Code of Conduct to alter or falsify information, including any record or document, to intentionally make a false or exaggerated statement or claim to anyone, or to mislead anyone. Anyone having concerns regarding questionable accounting or auditing matters should report their concerns to the CEO: ceo@usarchery.org or the Chair of the Ethics Committee: ethics@usarchery.org.

XIII. Business Relationships

It is imperative that all USAA suppliers, vendors, and other business relationships are managed in a fair, equitable, ethical, and legal manner consistent with the Code of Conduct, all applicable law and good business practices. Wherever practical, USAA provides a competitive opportunity for suppliers and vendors' business, and we enlist their active support in ensuring that we meet customer expectations regarding quality, cost, and delivery. 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. Prior to entering into a transaction or contract for a purchase or potential purchase that involves an actual or perceived conflict of interest, USAA

employees, volunteers, and contractors should consult with the CEO: ceo@usarchery.org or the Chair of the Ethics Committee: ethics@usarchery.org.

Similarly, you should consult and adhere to the Gift & Entertainment Policy, and if necessary, obtain permission pursuant to the policy, before giving or receiving any entertainment or gifts. A copy of the Gift & Entertainment Policy may be found on USAA's website at www.usarchery.org.

VIV. Business Dealings with or in Foreign Countries

Gifts: The giving of gifts to, and receiving of gifts from, foreign nationals or representatives of foreign governments is governed by a complex set of US and foreign laws. Generally, the giving and receiving of such gifts is very limited or prohibited. When acting in an official USAA capacity and before offering a gift to a foreign national, you must receive the approval of the CEO. In addition, if an exchange of gifts is both a legal and normal practice in your role with USAA, the giving and receiving of such gift(s) will be subject to USAA's Gift & Entertainment Policy. A copy of which may be found on USAA's website at www.usarchery.org.

Payments: It is a felony under United States laws for USAA, any of its employees, or anyone acting on its behalf to give, offer, promise, or authorize a payment to a foreign official, foreign political party or official thereof, or any candidate for foreign political office, for the purpose of corruptly obtaining or retaining business for USAA. United States law also makes it a felony to pay money or anything of value to a commission agent, sales representative, or consultant when there is knowledge or firm belief that the payment will be used to corruptly influence a government official in connection with business USAA is attempting to obtain or retain. Political contributions will not be made by or on behalf of USAA in foreign countries. USAA will observe the laws of foreign countries in which it operates concerning payments of agents' fees and commissions, provided these laws are not in conflict with United States law. As a USAA representative you are not to engage in activities designed to circumvent foreign laws concerning retaining or paying sales representatives and consultants.

Export Control Laws: It is USAA's policy to comply with the export and reexport control rules and regulations under the Export Administration Regulations (EAR) administered by the United States Department of Commerce and the International Trade in Arms Regulations (ITAR) administered by the United States Department of State. You are not to engage in any export-related transaction on behalf of USAA which would violate these regulations.

XV. Contact Information

USAA CEO: ceo@usarchery.org

Chair of the Ethics Committee: ethics@usarchery.org

Athlete Safety Coordinator: athletesafety@usarchery.org

Elite athletes who need confidential, independent advice or assistance in resolving a concern or dispute on any sport-related matter may contact the Office of the Athlete Ombudsman at ombudsman@usathlete.org or 719-866-5000.