



WHISTLEBLOWER POLICY

UPDATED: SEPTEMBER 2021

PURPOSE

USA Archery (USAA) is committed to high standards of ethical, moral and legal business conduct. In line with this commitment, and USAA's commitment to open communication, this policy aims to provide an avenue for employees, USA Archery Board of Directors and officers, members (including but not limited to athletes), committee members, task force members, hearing panel members volunteers, contractors and others to raise serious concerns with reassurance that they will be protected from reprisals or victimization for whistleblowing.

This whistleblowing policy is intended to cover protections for you if you raise concerns such as:

- Incorrect financial reporting;
- Unlawful activity;
- Activities that are not in line with USAA policy, including, but not limited to the Safe Sport Policy, Code of Ethics or Code of Conduct;
- Activities, which otherwise amount to serious improper conduct.

SAFEGUARDS

No Retaliation

USAA has an open-door policy and encourages individuals affiliated with USAA (e.g., employees, members and organization members, volunteers (including, but not limited to board and committee members, officials and other USAA designees and contractors) (collectively "Affiliated Individuals") to share questions, concerns, suggestions, or complaints in the way and to the people with which they are most comfortable. This means Affiliated Individuals have options for how to report any concern about a potential ethical, policy, financial or legal violation.

USAA has zero tolerance for retaliation against people who make good faith reports of potential ethical, policy, financial or legal violations, or who cooperate with investigations of those reports. That means no Affiliated Individual may threaten, harass, discriminate against, or take any negative employment (where applicable) or participation related action (e.g., discharge, demotion, suspension, non-assignment, negative review) on that basis.

Any such retaliation can be reported as described above in the same way as any other policy violation. It will be treated as a violation this Policy and USAA's Code of Conduct and may lead to serious consequences including termination of employment or participation for anyone involved in retaliation.

Anonymous Allegations – This policy encourages employees and others to put their names to allegations because appropriate follow-up questions and investigation may not be possible unless the source of the information is identified. Concerns expressed anonymously will be explored appropriately, but consideration will be given to:

- The seriousness of the issue raised;



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- The credibility of the concern; and
- The likelihood of confirming the allegation from attributable sources

Bad Faith Allegations – Allegations in bad faith may result in disciplinary action.

PROCESS FOR RAISING A CONCERN AND HANDLING AN ALLEGATION

Reporting - Individuals who believe they have been the victims of conduct prohibited by this policy or believe they have witnessed such conduct should discuss their concerns with their immediate supervisor (if applicable), and/or the USAA Chair of the Ethics Committee.

Individuals may also submit their allegation to the following email address: ethics@usarchery.org.

Panel - Allegations will be addressed by a panel consisting of three (3) members (at least one athlete) and the Chair of the Ethics Committee, all of whom shall be disinterested. If there is an individual on the panel who is also named in the allegation, such individual will recuse themselves and the remaining panel members will appoint an independent and uninvolved individual to take the place of the recused member.

Reporting Period - USAA encourages the prompt reporting of allegations or concerns so that rapid and constructive action can be taken. Therefore, no fixed reporting period has been established. However, early reporting and intervention have proven to be the most effective method of resolving actual or perceived incidents of alleged misconduct.

Investigation - Allegations will be investigated promptly. The investigation may include (but is not limited to) individual interviews with the parties involved and, where necessary, with individuals who may have observed the alleged conduct or may have other relevant knowledge.

Confidentiality - USAA will maintain confidentiality throughout the investigatory process to the extent consistent with adequate investigation and appropriate corrective action.

Questions – If you have questions or concerns about this policy you may speak with the USA Archery CEO at ceo@usarchery.org or the Chair of the Ethics Committee at ethics@usarchery.org.