



USAA CODE OF CONDUCT POLICIES

UPDATED DECEMBER 2019

SAFESPORT CODE POLICY STATEMENT

USA Archery (**USAA**) is committed to maintaining cooperative work, training and sports environments in which there exists mutual respect for all athletes, coaches, judges and other officials, and for all **USAA** directors, officers, employees and volunteers. **USAA** is committed to creating a safe and positive environment for its athletes and participants involved in sport, free of misconduct.

As a member organization of the U.S. Olympic & Paralympic Committee, **USAA**, its employees, contractors, volunteers, officials, board and committee members and other designees, its members and organization members (collectively, "Covered Participants") are required to comply with the U.S. Center for SafeSport Code for the U.S. Olympic and Paralympic Movement, as amended from time to time (the "Code"), including reporting requirements. Except as specifically noted in the Code, the Code applies without respect to age or competitive level. The Code serves as the benchmark by which the U.S. Center for SafeSport or **USAA** determines whether a SafeSport Code Violation has occurred. For those violations that fall within the jurisdiction of the U.S. Center for Safe Sport as defined in the Center's Code, the Center will determine resolutions and sanctioning for the violation. Any SafeSport Code Violation that occurs outside the jurisdiction of the U.S. Center for SafeSport will be processed by **USAA** as outlined later in this document.

The Code outlines prohibited conduct related to:

- Criminal Charges or Dispositions
- Child Abuse
- Sexual Misconduct
- Emotional and Physical Misconduct, including Stalking, Bullying, Hazing and Harassment
- Aiding and Abetting
- Misconduct Related to Reporting
- Misconduct Related to the U.S. Center for SafeSport's Process
- Other Inappropriate Conduct
- Violation of Minor Athlete Abuse Prevention Policies / Proactive Policies

The definitions of prohibited conduct and other defined terms contained in the Code are incorporated herein by this reference. The Code in its full form along with reporting guidelines can be found at the U.S. Center for SafeSport website at www.safesport.org.

All Covered Participants must not engage in any form of prohibited conduct.

ADDITIONAL REQUIREMENT: To the extent a Covered Participant has regular contact with amateur athletes who are minors (i.e., those under the age of 18), they must abide by **USAA's** Minor Athlete Abuse Prevention Policy (the "MAAPP") located at www.usarchery.org.

In addition to the foregoing, engaging in misconduct, which is contrary to **USAA** policy of equal employment and sports opportunity without regard to age, sex, sexual orientation, citizenship, religion, race, disability or national or ethnic origin, will not be tolerated within the **USAA**.

Other **USAA** policies, procedures and codes, including, but not limited to, the **USAA** Code of Conduct and Code of Ethics, may deal with other forms of conduct that are prohibited and that are subject to action by **USAA** for violation of such policies, procedures and codes.

BACKGROUND SCREENING

At a minimum of every two years the following individuals must undergo background screening:

- **USAA** employees;
- Individuals **USAA** formally authorizes or appoints to (a) serve in a position of authority over, or (b) have frequent contact with athletes. This shall include, but not be limited to staff, volunteers¹, coaches, instructors, judges, administrators, board members, trainers, medical personnel and local affiliated administrators/directors;
- Assistants, or personal care assistants who are funded, have a contractual obligation with, or are credentialed by **USAA**, or otherwise have regular contact with **USAA** athletes;
- All athletes and alternates, training partners², and guides who are selected by **USAA** to participate in national or international teams or Delegation Events^{3,4};
- All athletes and alternates, training partners, and guides that are selected by **USAA** to train at any Olympic & Paralympic Training Center or USOPC High Performance Training Center;
- Individuals affiliated with the media who are authorized or credentialed by **USAA** to access a training site or attend a competition run by **USAA** if such individual has unsupervised one-on-one interactions with athletes;
- Other individuals who have regular contact with athletes as determined by **USAA**, in its sole discretion and/or as required by USOPC.

For purposes of clarification, **USAA** is considered to “formally authorize or appoint” an individual in instances where **USAA** has control over the authorization or appointment process.

All of the above persons will be collectively referred to as, the “Background Screening Pool”.

If you have a question regarding the Background Screening Pool, please contact athletesafety@usarchery.org.

In **USAA**'s discretion it may bypass the Background Screening requirement for those people who are minors (i.e., under 18 years of age).

As to members of the Background Screening Pool and that are newly taking a role, the **USAA** requires the background screening prior to the commencement of the new role.

As to members of the Background Screening Pool attending a **USAA** conducted activity or Delegation Event, **USAA** requires background screening prior to the commencement of the activity or event.

USAA will also perform supplemental (off-year) background screens on the Background Screening Pool.

Notwithstanding the foregoing, **USAA** in its sole discretion may require a background screen for additional individuals involved with **USAA**.

USAA will track all Background Screening and perform periodic checks to ensure compliance with this policy.

It is the responsibility of each organizer, Club and State Association to monitor this policy with regard to its participants, volunteers and administrators, etc. A person may be disqualified and prohibited from working with

¹ Volunteers who only have incidental and observable contact with athletes at events are exempt from this requirement.

² International training partners staying less than 14 days are exempt from this requirement.

³ Delegation Event means international sporting events as designated by the USOPC, including, but not limited to the Olympic, Paralympic, Pan American, Parapan American, Youth Olympic Games.

⁴ Individuals referenced in this subsection shall have 45 days after reaching the age of majority (18 years of age), to come into compliance with this background screening requirement.

USAA and/or participating in **USAA** sanctioned activities if there is a red light finding in his/her background screen. Notwithstanding the foregoing, due to the limitations of background screening, it is but one factor **USAA** will use in assessing the appropriateness of an individual's level or access and/or involvement with **USAA**.

The **USAA** Background Screen Criteria and Review Process is set forth on Exhibit A, attached hereto.

ADDITIONAL REQUIREMENT: To the extent a Covered Participant has regular contact with amateur athletes who are minors (i.e., those under the age of 18), they must abide by **USAA's** Minor Athlete Abuse Prevention Policy (the "MAAPP") located at www.usarchery.org.

U.S. CENTER FOR SAFESPORT TRAINING

USAA requires safe sport education and training for:

USAA employees.

- Individuals **USAA** formally authorizes or appoints to (a) serve in a position of authority over, or (b) have frequent contact with athletes. This shall include, but not be limited to staff, volunteers, coaches, instructors, judges, administrators, board members, trainers, medical personnel and local affiliated administrators/directors.
- Assistants, or personal care assistants who are funded, have a contractual obligation with, or are credentialed by **USAA**, or otherwise have regular contact with **USAA** athletes.
- All athletes and alternates, training partners, and guides who are selected by **USAA** to participate in national or international teams or Delegation Events.
- All athletes and alternates, training partners, and guides that are selected by **USAA** to train at any Olympic & Paralympic Training Center or USOPC High Performance Training Center.
- Individuals affiliated with the media who are authorized or credentialed by **USAA** to access a training site or attend a competition run by **USAA** if such individual has unsupervised one-on-one interactions with athletes.
- Other individuals who have regular contact with athletes as determined by **USAA**, in its sole discretion and/or as required by USOPC.

For purposes of clarification, **USAA** is considered to "formally authorize or appoint" an individual in instances where **USAA** has control over the authorization or appointment process.

All of the above listed individuals will be collectively referred to as the "Training Pool".

If you are under the age of 18, parental consent is required in order to take the training.

As to members of the Training Pool newly taking a role, the **USAA** requires completion of the education and training prior to contact with an amateur athlete who is a minor begins, or within forty-five (45) days beginning a new role subjecting the adult to this policy. Notwithstanding the foregoing, to the extent an individual has regular contact with amateur athletes who are minors, they must abide by the policies and additional training requirements and timelines set forth in **USAA's** Minor Athlete Abuse Prevention Policy (the "MAAPP") located at www.usarchery.org.

USAA also encourages its athletes and anyone else involved in this sport to take the training. If you are under the age of 18, parental consent is required in order to take the training.

USAA will perform periodic checks to ensure compliance with this policy. If you have a question on the Training Pool requirements, please contact athletesafety@usarchery.org.

ADDITIONAL REQUIREMENTS: To the extent a Covered Participants has regular contact with amateur athletes who are minors (i.e., those under the age of 18), they must abide by **USAA's** Minor Athlete Abuse Prevention Policy (the "MAAPP") located at www.usarchery.org.

MINOR ATHLETES WHO REACH 18 YEARS OF AGE AND THEN OBTAIN A POSITION OF AUTHORITY: Minor athletes who reach 18 years of age and then obtain a position of authority that presents a power imbalance, such as becoming a coach or official, must also abide by the policies and additional training requirements set forth in the MAAPP regardless of the age of the minor athletes with whom they will interact.

USAA will track all U.S. Center for SafeSport Training and perform periodic checks to ensure compliance with this policy.

It is the responsibility of each organizer, Club and State Association to monitor this policy and the Code with regard to its participants, volunteers and administrators, etc.

WILLFULLY TOLERATING MISCONDUCT

Willfully tolerating misconduct is unacceptable and a violation of this policy and the Code. It is a violation of the Code if a party knows of misconduct but takes no action to report it.

FALSE AND MALICIOUS ACCUSATIONS

Any person who makes a false, frivolous or malicious complaint of misconduct (as contrasted with complaints which, even if erroneous, are made in good faith) will be subject to disciplinary action. Depending on the nature of the allegation, a person making a false, frivolous or malicious report may also be subject to civil or criminal proceedings.

REPORTING, COMPLAINTS, INVESTIGATIONS, AND DISCIPLINE

Every Covered Participant must report violations of the Code (including violations of any Minor Athlete Abuse Prevention Policy) and suspicions or allegations of misconduct. All cases of suspected emotional, physical or sexual abuse of a minor (under the age of 18) must be reported to law enforcement immediately. Filing a report with the Center and/or **USAA** does not satisfy this obligation.

USAA and the U.S. Center for SafeSport recognize that it can be difficult to report an allegation of misconduct and strives to remove as many barriers to reporting as possible. **Anonymous reports may be made in writing as set forth below and there isn't any filing fee.** However, an anonymous report may limit **USAA's** ability to investigate and respond to a report. Thus, **USAA** strongly encourages those making a report to provide their name and contact information.

TO REPORT TO THE U.S. CENTER FOR SAFESPORT - CLICK:

<https://safesport.org/report-a-concern>. If possible, please copy **USAA**, so that **USAA** may implement any necessary interim measures.

Please report all issues falling outside of the Center's authority to **USAA**.

TO REPORT TO USAA: Please visit www.usarchery.org to download and complete the **USAA** Athlete Safety Reporting Form and submit to athletesafety@usarchery.org. In the event that any party is alleged to have violated the Code, or in the event that **USAA** receives a complaint or a report that is required to be referred to the U.S. Center for SafeSport, **USAA** shall report and refer such matter to the U.S. Center for SafeSport which shall have jurisdiction and authority over such matter; provided that such referral shall not supersede any local, state, or federal reporting requirements or jurisdiction.

All alleged violations over which the U.S. Center for SafeSport Response and Resolution Office does not exercise either exclusive or discretionary authority and falls within **USAA's** jurisdiction – employee/volunteer matters will be

handled pursuant to employee policies and procedures, and issues falling under the Ted Stevens Olympic and Amateur Sports Act (the "TSOASA") will be submitted to a hearing panel appointed by the **USAA** Board of Justice for resolution pursuant to the complaint procedures set forth in Article XV of the **USAA** Bylaws (available on the **USAA** website). In an attempt to encourage reporting, a report initiated as set forth in this Policy will be considered to be filed properly (i.e., such filing does not have to follow the filing requirements of **USAA** Bylaws Article XV, Section 15.3). If such an alleged violation occurs when a team sponsored by **USAA** or the USOPC is traveling to or from, or participating at, a competition and it is necessary to expedite the proceeding in order to resolve a matter relating to the competition, such matter shall be resolved pursuant to the expedited procedures set forth in Section 15.10 of Article XV which require that such complaint shall be heard and decided within twenty-four (24) hours of the filing.

The hearing panel will determine whether a violation of the Code has occurred and if so, what discipline is warranted. Such discipline may include but is not limited to immediate dismissal from a **USAA** training camp, event or program, or a **USAA** or USOPC sponsored team; being precluded from participating at **USAA** or USOPC sanctioned events or other competitions; and being sent home at such person's own expense.

FURTHER INFORMATION

For guidance and questions regarding the Code please contact the U.S. Center for SafeSport (www.safesport.org).



EXHIBIT A: BACKGROUND SCREENING SEARCH CRITERIA AND REVIEW

BACKGROUND SCREENING SEARCH CRITERIA

Full background screens will include at least the following search components:

- Social Security Number validation;
- Name and address history records;
- Two independent Multi-Jurisdictional Criminal Database searches covering 50 states plus DC, Guam and Puerto Rico;
- Federal District Courts search for each name used and district where the individual currently lives or has lived during the past seven years, going back the length of time records are available and reportable;
- County Criminal Records for each name used and county where the individual currently lives or has lived during the past seven years, going back the length of time records are available and reportable for each county searched;
- National Sex Offender Registry database search of all available states, plus DC, Guam and Puerto Rico;
- Multiple National Watch Lists;
- SafeSport Disciplinary Records;
- Comprehensive International Records search U.S. citizens who have lived outside of the United States for six consecutive months in any one country, during the past seven years; and
- Motor Vehicle Records of at least a 3-year history in the state of licensure (if driving is required for position).

Supplemental (off-year) background screening will include at least the following search components:

- Multi-Jurisdictional criminal database covering 50 states plus DC, Guam and Puerto Rico;
- Sex Offender Registry database searches of all available states, plus DC, Guam and Puerto Rico; and
- SafeSport Disciplinary Records.

Background screening for media personnel, and those that must be conducted by third-party vendors/contractors, all such searches will be conducted using a name-based or fingerprint-based record search in any combination that shall include at least:

- Social Security Number validation;
- Multi-Jurisdictional Criminal Database searches covering 50 states plus DC, Guam and Puerto Rico;
- Federal District Courts search for each name used and district where the individual currently lives or has lived during the past seven years, going back the length of time records are available and reportable;
- County Criminal Records for each name used and county where the individual currently lives or has lived during the past seven years, going back the length of time records are available and reportable for each county searched;
- National Sex Offender Registry database search of all available states, plus DC, Guam and Puerto Rico; and
- SafeSport Disciplinary Records.

BACKGROUND SCREENING REVIEW PROCESS

USAA initiated background screening that result in a report of a disposition or resolution of a criminal proceeding, other than an adjudication of not guilty⁵, for any of the below criminal offenses will be subject to **USAA's** determination as to the individual's level of access and involvement in **USAA**:

1. Any felony⁶; and
2. Any misdemeanor involving:
 - a. All sexual crimes, criminal offenses of a sexual nature to include but not limited to; rape, child molestation, sexual battery, lewd conduct, possession and distribution of child pornography, possession and distribution of obscene material, prostitution, indecent exposure, public indecency, and any sex offender registrant⁷;
 - b. Any drug related offenses;
 - c. Harm to a minor and vulnerable person, including, but not limited to, offenses such as child abandonment, child endangerment/neglect/abuse, contributing to the delinquency of a minor, and DUI with a minor;
 - d. Violence against a person (including crimes involving firearms and domestic violence);
 - e. Stalking, harassment, blackmail, violation of a protection order and/or threats;
 - f. Destruction of property, including arson, vandalism, and criminal mischief; and
 - g. Animal abuse or neglect.

⁵ A "disposition or resolution of a criminal proceeding, other than an adjudication of not guilty" shall include, but is not limited to: an adjudication of guilt or admission to a criminal violation, a plea to the charge or a lesser included offense, a plea of no contest, any plea analogous to an Alford or Kennedy plea, the disposition of the proceeding through a diversionary program, deferred adjudication, deferred prosecution, disposition of supervision, conditional dismissal, juvenile delinquency adjudication, or similar arrangement, or the existence of an ongoing criminal investigation, a warrant for arrest, or any pending charges.

⁶ For purposes of these procedures, the term "felony" shall refer to any criminal offense punishable by imprisonment for more than one year.

⁷ Any participant that has been convicted of, received an imposition of a deferred sentence for, or any plea of guilty or no contest for any sexual crime, criminal offense of a sexual nature, and/or is a sex offender registrant must report this to **USAA**. **USAA** will report the same to USOPC.

BACKGROUND SCREENING PROCEDURES

- A. Individuals will receive two separate Green Light/Red Light notifications: one for their criminal check and one for their driving history check (if applicable). In the event of a Red Light, **USAA**'s background screening provider will send an adverse action letter to the individual.
- B. After receiving notification of a Red Light Review, the **USAA** Review Panel will determine if and to what degree the individual will be: (a) affiliated with the **USAA**, (b) granted access to an Olympic Training Center, (c) permitted to participate in a Delegation Event, or (d) granted driving privileges in accordance with the Background Screening Policy and these procedures.
- C. **USAA** will notify the USOPC of any decision reached by **USAA**, which has the effect of allowing a participant covered by **USAA**'s Background Screening Policy to reside, train or compete at an Olympic Training Center or participate in a Delegation Event, if the individual's background screen was flagged for any disposition or resolution of a criminal proceeding, other than an adjudication of not guilty for any of the below crimes:

Any felony involving:

- 1. Violence against a person within the previous ten (10) years;
- 2. Violent crimes involving weapons (including armed robbery and aggravated assault with a weapon) within the previous ten (10) years; and
- 3. Animal abuse, cruelty or neglect.
- 4. As well as any felony or misdemeanor involving:
- 5. All sexual crimes and criminal offenses of a sexual nature to include, but not limited to: rape, child molestation, sexual battery, lewd conduct, possession or distribution of child pornography, possession and distribution of obscene material, and any sex offender registrant (excluding prostitution, indecent exposure, and public indecency);
- 6. Drug offenses including drug distribution, intent to distribute, manufacturing, trafficking, or sale within the previous 7 years (excluding crimes for drug use or possession); and
- 7. Harm to a minor or vulnerable person, including, but not limited to: offenses such as child abandonment, child endangerment/neglect/abuse, contributing to the delinquency of a minor, providing alcohol to a minor, and DUI with a minor.

BACKGROUND SCREENING REVIEW PANEL

USAA's Background Screening Review Panel shall consist of the Board of Justice (and/or their designees).

- A. The **USAA** Review Panel will conduct a hearing. The individual will be notified of a specific date and time so that they may participate if they wish.

Unless the Review Panel requires the individual to attend the hearing in person, the individual may appear by telephone conference call. The individual has the right to be represented by legal counsel at the hearing.

At the hearing the individual will be allowed to present any evidence or argument that he or she wishes the Review Panel to consider. The Review Panel may require that documentary evidence and the names of any witnesses be disclosed prior to the hearing. Internal and/or external medical expertise.

Upon the request of the individual, and if it is necessary to expedite the proceeding in order to resolve a matter relating to training or a competition that is scheduled, the Review Panel may render an expedited determination.

- B. A determination of the individual's involvement with **USAA** will be made based on a majority vote of the Review Panel and may include interim measures. In rendering its finding, the Review Panel shall consider the following:

- a. The legitimate interest of **USAA** in providing a safe environment for athletes and other individuals involved in the sport;
- b. The seriousness of the criminal offense or act;
- c. The time which has elapsed since the occurrence of the criminal offense or act;
- d. The age of the person at the time of occurrence of the criminal offense or act;
- e. The bearing, if any, the criminal offense or act has on the individual's ability to perform the necessary functions of their role or otherwise be a representative of the **USAA**;
- f. Any information produced by the individual, or produced on behalf of the individual with respect to the individual's rehabilitation and good conduct;
- g. Any voluntary restrictions on access proposed by the individual;
- h. Any other information, which in the determination of the Review Panel, would bear on whether or not the individual should represent **USAA**.

- C. The Review Panel will communicate its finding to the individual. If the individual disagrees with the finding of the Review Panel, they may appeal the decision by filing a demand for arbitration with the American Arbitration Association ("AAA") within thirty (30) days of the Review Panel's decision. A decision rendered by the AAA shall be final and binding on all parties.

APPLICATION FOR BACKGROUND SCREEN REVIEW

To request for a secondary background screen review please email athletesafety@usarchery.org any time after receiving a “Red Light” notification.

PAYMENT INFORMATION

In cases where the **USAA** directly assigns or nominates an individual to serve in a Delegation Event role or to be a member of the official Games Delegation, or **USAA** staff, payment for the background screening will be the responsibility of **USAA** or other third party. In all other instances, payment for the background screening will be arranged by the individual.



USAA CONFLICT OF INTEREST POLICY

SECTION 1. POLICY STATEMENT

USA Archery (USAA) is committed to sustaining an ethical workplace free of conflicts of interest and perceived conflicts of interest. Each Decision Maker (as defined below) has the responsibility to administer the affairs of **USAA** honestly and prudently, and to exercise their best care, skill, and judgment for the sole benefit of **USAA**. Those persons shall exercise the utmost good faith in all transactions involved in their duties, and they shall not use their positions with **USAA** or knowledge gained therefrom for their personal benefit. The interests of the organization must be the first priority in all decisions and actions. **USAA** requires that any of its Decision Makers recognize, attempt to avoid activities or investments that involve, might appear to involve, or could result in a potential conflict of interest.

A **“Conflict of Interest”** or **“Conflict”** exists when a Decision Maker acts on behalf of **USAA** in connection with a transaction to which **USAA** is a party, where the Decision Maker’s actions or relationships present the potential for improper personal gain or advantage, or for an adverse effect on the interests of **USAA**, or where the Decision Maker’s actions or relationships create the appearance that the Decision Maker will not be able to put **USAA**’s interests first. A **“conflict of interest”** also exists in the context of athlete or team selection when a Decision Maker participates in a selection decision that involves or impacts an athlete with whom the Decision Maker has a direct or indirect relationship, or when a Decision Maker participates in a benefits or services allocation decision that directly impacts the Decision Maker.

This policy does not attempt to provide an exhaustive list of every possible circumstance that might give rise to a conflict of interest, but provides examples of situations that create conflicts of interest as a guide to the types of transactions (a **“transaction”** is any contract, transaction, agreement or relationship involving the sale or purchase of goods, services, or rights of any kind, the providing or receipt of a grant or loan, or the establishment of any other financial relationship with **USAA**) and/or relationships that can create conflicts of interest.

SECTION 2. PERSONS CONCERNED

This Conflict of Interest Policy is applicable to all **USAA** Decision Makers. **“Decision Makers”** include, but are not limited to, members of **USAA**’s Board of Directors (the Board of **USAA**), officers, committee members, task force members, hearing panel members, employees, and volunteers.

SECTION 3. AREAS IN WHICH CONFLICTS MAY ARISE

Conflicts of interest may arise in the relations of Decision Makers with any of the following third parties: (1) Persons and firms supplying goods and services to **USAA**; (2) Persons and firms from whom **USAA** leases property and equipment; (3) Persons and firms with whom **USAA** is dealing or planning to deal in connection with the gift, purchase or sale of real estate, securities or other property; (4) Competing or affinity organizations; (5) Donors and others supporting **USAA**; (6) Agencies, organizations, and associations which affect the operations of **USAA**; or (7) Family members, friends, and other employees. A **“Family Member”** is defined as a spouse, parent, child or a spouse of a child, brother, sister, or spouse of a brother or sister, of a Decision Maker.

A conflicting interest may be defined as an interest, direct or indirect, with any persons or firms mentioned above. The list below is not intended to be an all-inclusive list of every instance that may create a conflict of interest, but, rather, is simply a sample of the types of relationships and activities that could create a conflict of interest. If a Decision Maker or other disclosing individual has any question as to whether a relationship or activity may create a conflict of interest, a disclosure must be made. A potential conflict of interest might exist in the following circumstances:

1. Owning stock or holding debt or other proprietary interests in any third party dealing or potentially dealing with **USAA**.
EXAMPLE: When a **USAA** board member owns an interest in a company seeking to enter into a contract to provide consulting services to **USAA**.
2. Owning a business, maintaining a second job, or providing goods or services under a provider, contractor, or consulting agreement, whereby the outside business provides goods or services to **USAA**, the USOPC, or any other NGB.
EXAMPLE: When **USAA** is contemplating entering into an agreement for the provision of consulting services by a board member of **USAA**.
3. Holding office, serving on the board, participating in management, or being otherwise employed (or formerly employed) with any third party dealing with **USAA**.
EXAMPLE: When a **USAA** board member is the CEO of a company negotiating a contract to provide services to **USAA**.
4. Receiving remuneration for services with respect to individual transactions involving **USAA**.
EXAMPLE: When a **USAA** board member gets paid a commission if **USAA** enters into a particular contract with a third party.
5. Using **USAA**'s time, personnel, equipment, supplies, information or data (including member data), assets, resources or goodwill for anything other than **USAA**-approved activities, programs, and purposes.
EXAMPLE: When a **USAA** employee uses a **USAA** vehicle for a personal road trip.
6. Soliciting or receiving personal gifts, loans, gratuities, or discounts from third parties in violation of **USAA**'s Gift & Entertainment Policy. No personal gift of money should ever be accepted.
EXAMPLE: When a company trying to obtain a contract to provide services to **USAA** provides a \$100 gift certificate to a **USAA** board member who would be voting on whether **USAA** should execute the contract in question.
EXAMPLE: Asking for box seats of field of play access to a sporting event because of your position on **USAA**'s board of directors.
EXAMPLE: Accepting tickets to an NFL game worth \$250 from a business seeking to obtain a contract to provide landscaping services for **USAA** headquarters.
7. Acting (or having a family member act) as an agent, representative, or consultant to a business whose interests may conflict with the interests of **USAA**.
EXAMPLE: when a **USAA** board member agrees to promote another NGB in negotiations with potential sponsors of licensees.
EXAMPLE: when the spouse of a **USAA** board member works for or is an investor in a company that competes with **USAA** or that provides services to a company that competes with **USAA**.
8. Having (or having a family member with) a business relationship with a sponsor, supplier, licensee, or vendor of **USAA**.
EXAMPLE: when a family member provides legal services to one of **USAA**'s sponsors.
9. Awarding **USAA** business to, or provide favorable treatment to, a business owned or controlled by a volunteer, family member, or personal friend.
EXAMPLE: Awarding a contract to provide landscaping services for **USAA** headquarters to a family member's landscaping business.

10. Having activities or interests, whether direct or indirect, that interfere with or influence, or have the potential to interfere with or influence, a Decision Maker's responsibilities on behalf of **USAA** or to undermine the interests of **USAA**.

EXAMPLE: A **USAA** board member has a significant client who owns or operates a facility being considered as the host of a **USAA** event.

EXAMPLE: A Decision Maker serves on a hearing panel or appeal panel involving discipline against a member of the Decision Maker's club / team / family.

EXAMPLE: An athlete is the potential recipient of benefits or services that are being allocated by **USAA** and participates in the allocation decision.

SECTION 4. INTERPRETATION OF THIS CONFLICT OF INTEREST POLICY

The areas of conflicting interest and relations in those areas which may give rise to a conflict, as listed in Section 3, are not exhaustive. Decision Makers should, in the first instance, attempt to avoid all relationships and activities which may give rise to a potential conflict of interest, whether or not listed expressly in Section 3.

However, the fact that one of the interests described in Section 3 exists does not necessarily mean that a conflict exists, or that the conflict, if it exists, is material enough to be of practical importance, or if material, that upon full disclosure of all relevant facts and circumstances it is necessarily adverse to the interests of **USAA**. However, it is **USAA's** policy that the existence of any of the interests described or similar in nature to those described in Section 3 shall be disclosed before any transaction is consummated or any vote taken on an action, contract, relationship, or decision that would give rise to the potential conflict of interest. It shall be the continuing responsibility of each Decision Maker to scrutinize his/her transactions and outside business interests and relationships for potential conflicts and to immediately make such disclosures.

For Athletes With Questions Regarding This Conflict of Interest Policy:

The Athlete Ombudsman provides cost-free, independent and confidential advice regarding athlete rights; resolving disputes or grievances; and any sport rule, policy, or process, including NGB-athlete agreements, codes of conduct or team selection procedures. The Athlete Ombudsman can also help athletes connect with legal counsel or mental health resources if needed. Athletes may contact the Athlete Ombudsman at:

PHONE: (719) 866-5000

EMAIL: ombudsman@usathlete.org

WEBSITE: www.usathlete.org

SECTION 5. DISCLOSURE POLICY AND PROCEDURE

In addition to the mandatory disclosures required from each Decision Maker under Section 10 and Section 11 of this policy, any individual with a good faith belief that a Decision Maker has a conflict of interest may notify **USAA** of such perceived conflict pursuant to the procedures set forth below. Such notice may be provided anonymously. Furthermore, should any Decision Maker become aware of any undisclosed conflict of interest, or any conflict of interest not fully disclosed, such person should make full disclosure of their knowledge of the conflict of interest involved to **USAA's** Ethics Committee.

Disclosure should be made to the Ethics Committee, which shall bring the matter to the attention of any other relevant party as necessary.

After disclosure of the conflict or potential conflict of interest and all material facts, and after any discussion with the interested person, the Ethics Committee shall decide if a conflict of interest exists pursuant to the procedures set forth in Section 6 below, as applicable, and if there are mitigating measures that could be implemented to permit **USAA** to move forward with the transaction or activity.

Transactions with parties with whom a conflicting interest exists may be undertaken only if all of the following, at a minimum, are observed:

1. The conflicting interest is fully disclosed;
2. The person with the conflict of interest is excluded from the discussion and approval of such transaction;
3. A competitive bid or comparable valuation exists; and
4. The Ethics Committee has determined that the transaction is in the best interest of the organization pursuant to Section 6 below.

SECTION 6. PROCEDURES FOR ADDRESSING POSSIBLE CONFLICTS OF INTEREST WITH RESPECT TO TRANSACTIONS OR BUSINESS OF USAA

In the event a possible conflict of interest exists with respect to a proposed transaction, promptly and before any decision is made regarding the proposed transaction, the proposed transaction shall be addressed as follows:

1. The interested person may make a presentation to the Ethics Committee, which may be convened telephonically, regarding the transaction or arrangement involving the possible conflict of interest.
2. The Ethics Committee shall review alternatives to the proposed transaction or arrangement as presented to the Ethics Committee by the board, staff, or relevant committee.
3. After exercising due diligence, the Ethics Committee shall determine whether **USAA** can obtain with reasonable efforts a more advantageous transaction or arrangement from a person or entity that would not give rise to a conflict of interest.
4. If a more advantageous transaction or arrangement is not reasonably possible under circumstances not producing a conflict of interest, the Ethics Committee shall determine by a majority vote whether the transaction or arrangement is in **USAA's** best interest, for its own benefit, and whether it is fair and reasonable. In conformity with the above determination, the Ethics Committee shall inform the board or committee whether there is a conflict of interest precluding **USAA** from entering into the transaction or arrangement, or if there are mitigating measures that may be implemented to alleviate concerns regarding the potential conflict of interest.

SECTION 7. VIOLATIONS OF THE CONFLICTS OF INTEREST POLICY

1. If the Ethics Committee has reasonable cause to believe a Decision Maker has failed to disclose actual or possible conflicts of interest, it shall promptly inform the Decision Maker of the basis for such belief and afford the member an opportunity to explain the alleged failure to disclose.
2. If, after hearing the member's response and after making further investigation as warranted by the circumstances, the Ethics Committee determines the Decision Maker has failed to disclose an actual or

possible conflict of interest, it shall take appropriate disciplinary and corrective action. The Ethics Committee's decision shall be final.

3. While any such failure to disclose an actual or possible conflict of interest is under investigation, the Decision Maker shall be precluded from engaging in further decisions of **USAA** that bear any relation whatsoever to the matter that is the subject of the actual or possible conflict of interest.

SECTION 8. RECORDS OF PROCEEDINGS:

The minutes of the Ethics Committee meetings shall contain:

1. The names of the persons who disclosed or otherwise were found to have a connection with an actual or possible conflict of interest, the nature of the conflict of interest, any action taken to determine whether a conflict of interest was present, and the Ethics Committee's decision as to whether a conflict of interest in fact existed; and
2. The names of the persons who were present for discussions and votes relating to the transaction or arrangement, or selection process, the content of the discussion (including, but not limited to, an analysis of the fairness and reasonableness of the transaction or arrangement in question, or the fairness of having the individual participate in the selection process), including any alternatives to the proposed transaction or arrangement, and a record of any votes taken in connection with the proceedings.

SECTION 9. FALSE AND MALICIOUS ACCUSATIONS:

Any person who makes a false or malicious allegation of a violation of this policy (as opposed to allegations made in good faith, even if erroneous) will be subject to disciplinary action.

SECTION 10. ANNUAL STATEMENTS

Each Decision Maker shall annually sign and submit to the Ethics Committee and **USAA's** CEO a statement, using the form attached hereto, which affirms such person:

1. Has received a copy of the conflicts of interest policy;
2. Has read and understands the policy;
3. Has agreed to comply with the policy, and
4. Understands that **USAA** is a charitable organization and in order to maintain its federal tax exemption it must engage primarily in activities which accomplish one or more of its tax-exempt purposes. Each annual disclosure shall be reviewed and addressed by the Ethics Committee.

Any actual, perceived, or potential conflict of interest should be disclosed in the annual statement.

Any new **USAA** employee shall submit a conflict of interest disclosure statement within 14 days of his or her hiring by **USAA**. Any other new Decision Maker shall submit a conflict of interest disclosure statement by the earlier of 14 days after his or her appointment or his or her first board, committee, or task force meeting. In no event shall a Decision Maker participate in any decisions to commit **USAA** to a proposed transaction or in athlete or team selection procedures prior to submission of his or her conflict of interest disclosure statement.

USAA shall maintain copies of all Annual Statements submitted under this Section 10.

SECTION 11. PERIODIC STATEMENTS / UPDATES

On an annual basis **USAA** shall send out and collect Conflict of Interest forms. Except as set forth below, all forms will be submitted to the Chair of the Ethics Committee. The Ethics Committee shall review all forms to determine if any conflict exists. If no conflict of interest exists, the Chair of the Ethics Committee will sign and date the forms. If there is a conflict, they will escalate the issue to the CEO and Board Chair. The Ethics Committee will keep minutes of the Conflict of Interest determination meeting(s) and return all completed forms to **USAA** for safekeeping. With regard to employee, athlete and contractor conflict of interest forms, they may be reviewed by the appropriate direct supervisor. The direct supervisor will review the forms to determine if any conflict exists. If no conflict of interest, he/she will sign and date the form. If there is a conflict, he/she will escalate the issue to the CEO. The supervisor will return all completed forms to **USAA** for safekeeping.

Each director, officer, committee member, task force member, hearing panel member, and employee shall submit to **USAA** a signed statement as necessary describing: (a) any groups such person is affiliated with as staff members (even if appointed by **USAA**), and (b) any new potential conflicts of interest as and when such potential conflicts of interest arises. **USAA** shall maintain copies of all Periodic Statements or updates submitted under this Section 11 and refer applicable statement updates to the Chair of the Ethics Committee for review to determine if any conflict exists.

SECTION 12. FURTHER INFORMATION

For questions regarding this Conflict of Interest Policy please contact the Chairman of the **USAA** Ethics Committee at ehowardpc@gmail.com or the **USAA** CEO at rmenzer@usarchery.org.



USA ARCHERY CONFLICT OF INTEREST DISCLOSURE STATEMENT

I, _____, am a member of **USAA** and/or serve **USAA** in the following manner(s):

- Board of Directors
- Committee Member

Please specify which committee(s) _____

- Task Force Member

Please specify which task force(s) _____

- Hearing Panel Member

Please specify which hearing panel(s) _____

- Employee
- Volunteer
- Selection Committee
- Athlete Representative
- Contractor
- Other _____

I attest to the following:

- I have received the **USAA** Conflict of Interest Policy (the "Policy").
- I have read and understand the Policy.
- I agree to comply with the Policy.
- I understand that **USAA** is a charitable organization and in order to maintain its federal tax exemption it must engage primarily in activities which accomplish one or more of its tax-exempt purposes.

Note: This disclosure statement also requires you to provide information with respect to certain other parties that are related to you. These persons are called "affiliated persons" and include, but are not limited to:

- A. Your spouse, domestic partner, child, mother, father, brother, sister, grandparent, cousin or other blood relative;
- B. Any corporation or organization of which you are a board member, an officer, a partner, participate in management or are employed by, or are, directly or indirectly, a debt holder or beneficial owner of any class of equity securities; and
- C. Any trust or other estate in which you have a substantial beneficial interest or as to which you serve as a trustee or in a similar capacity.

1. Have you or any of your affiliated persons provided services (other than board/committee/taskforce/hearingpanel/employee/contractor/volunteer service) or property to **USAA** in the past year?

YES NO

If yes, please describe the nature of the services or property, and, if an affiliated person is/was involved, the identity of the affiliated person and your relationship to that person:

2. Have you or any of your affiliated persons purchased services or property from **USAA** in the past year?

YES NO

If yes, please describe the purchased services or property, and, if an affiliated person is/was involved, the identity of the affiliated person and your relationship to that person:

3. Please indicate whether you or any of your affiliated persons had any direct or indirect interest in any business transaction(s) in the past year to which **USAA** was or is a party.

YES NO

If yes, please describe the transaction, and, if an affiliated person is/was involved, the identity of the affiliated person and your relationship to that person:

4. Were you or any of your affiliated persons indebted to pay money to **USAA** at any time in the past year (other than travel advances or the like)?

YES NO

If yes, please describe the indebtedness, and, if an affiliated person is/was involved, the identity of the affiliated person and your relationship to that person:

5. In the past year, did you or any of your affiliated persons receive, or become entitled to receive, directly or indirectly, any personal benefits from **USAA** or as a result of your relationship with **USAA**, that in the aggregate could be valued in excess of \$1,000, that were not or will not be compensation directly related to your duties to **USAA**?

YES NO

If yes, please describe the benefit(s), and, if an affiliated person is/was involved, the identity of the affiliated person and your relationship to that person:

6. Are you or any of your affiliated persons a party to or do you or your affiliated persons have an interest in any pending legal proceedings involving **USAA**?

YES NO

If yes, please describe the proceeding(s), and, if an affiliated person is/was involved, the identity of the affiliated person and your relationship to that person:

7. If you are on an athlete selection committee, is there an affiliated person who is an athlete competing for a spot on the team, are you an athlete competing for a spot on the team, do you coach an athlete who is competing for a spot on the team, or do you have an immediate family member, employee, or colleague who is otherwise participating in the competition for which the selection committee has been convened?

YES NO

If yes, please describe the identity of the affiliated person, athlete, or person involved in or impacted by the selection proceedings in question, and your relationship to that person:

8. Are you aware of any other events, transactions, arrangements or other situations that have occurred or may occur in the future that you believe should be examined by **USAA's** board in accordance with the terms and intent of **USAA's** Conflict of Interest Policy?

YES NO

If yes, please describe the situation(s), and, if an affiliated person is/was involved, the identity of the affiliated person and your relationship to that person:

If there is any relationship or matter not disclosed above, which might be perceived to compromise your obligations to **USAA** under **USAA's** Code of Ethics or which may raise questions of a conflict between your duty and loyalty to **USAA** and your economic self-interest, please indicate here what that relationship or matter is. If none, please state "none".

I HERBY CONFIRM that my responses to the above questions are complete and correct to the best of my information and belief. I agree that if I become aware of any information that might indicate that this disclosure is inaccurate or that I have not complied with this policy, I will notify the board or committee Chairperson or General Counsel (as applicable) immediately.

Signature: _____

Reviewed by: _____

Date: _____

Date: _____



POLICY STATEMENT

USA Archery (**USAA**) is committed to maintaining work, training and sports environments where **USAA** athletes are **able** to attain their peak performance and **USAA** directors, officers, employees and volunteers are able to work both safely and responsibly. **USAA** believes that the consumption and/or abuse of alcohol and controlled substances is detrimental to a healthy state of mind, body and spirit in athletic competition and at work and is therefore committed to alcohol and drug-free work, training and sports environments.

As a member organization of the U.S. Olympic & Paralympic Committee, **USAA** and its members are required to comply with all anti-doping policies, procedures and protocols of the International Olympic Committee (IOC), World Archery, World Anti-Doping Agency (WADA), United States Anti-Doping Agency (USADA), and the United States Olympic & Paralympic Committee (USOPC). The list of banned substances, policies and procedures, and protocols may change from time to time and it is the member's obligation to stay informed about these changes. Lists of banned substances and all policies and procedures can be found on USADA's website at www.usada.org. Policy violations, response resolutions and sanctioning will be determined by USADA or WADA for all anti-doping cases.

PROHIBITED CONDUCT AT USAA EVENTS

Except as provided for in this Section, it is a violation of **USAA** policy for any **USAA** director, officer, volunteer, contractor or member participating in any event, training camp or competition sanctioned by the United States Olympic & Paralympic Committee (USOPC) or **USAA** (collectively a **USAA** Event) to consume alcohol or any controlled substances, or to have any alcohol or controlled substance in their system, during the hours in which any competitor is actively competing or shooting at any **USAA** Event.

It is a violation of **USAA** policy for any such person that has not reached the age of twenty-one

to consume alcohol at any time during any **USAA** Event. Such conduct is prohibited regardless of any local law, statute, ordinance or custom that may permit the consumption of alcohol by persons under the age of twenty-one (21).

It is a violation of **USAA** policy for any **USAA** director, officer, volunteer, contractor or member to possess, sell or otherwise provide any controlled substance to, or encourage the use of any controlled substance by, any other person during any **USAA** Event or to sell or otherwise provide alcohol during any **USAA** Event to any person who has not reached the age of twenty-one (21).

Notwithstanding the foregoing, **USAA** directors, officers, volunteers, contractors and members who are twenty-one (21) or older are permitted to consume alcohol within reason at a **USAA** Event: (a) for circumstances related to **USAA** business and as business needs dictate (if applicable), and/or (b) after the hours in which competitors are actively competing or shooting

at the **USAA** Event. However, it is a violation of **USAA** policy for any such person who chooses to consume alcohol at any **USAA** Event to display any behavior or engage in any action that causes or may cause danger to themselves or others or damage to any property or which is unsportsmanlike, offensive or inappropriate for a representative of the **USAA**, the USA or the sport of archery.

PROHIBITED CONDUCT AT WORK

Working after the apparent use of alcohol, controlled substances, or other drugs including prescription and nonprescription medications or abuse of any other substances that result in job impairment is prohibited. Furthermore, the possession, purchase, consumption (use) transfer or sale of alcohol, any illegal substance, drug, including illegal synthetics, drug, a controlled substance or related paraphernalia on **USAA** premises or while

conducting **USAA** business is prohibited. Marijuana and marijuana paraphernalia are also prohibited on USAA premises or while conducting **USAA** business.

Notwithstanding the foregoing, **USAA** employees who are twenty-one (21) or older are permitted to consume alcohol within reason at a **USAA** Event: (a) for circumstances related to **USAA** business and as business needs dictate (if applicable), and/or (b) after the hours in which competitors are actively competing or shooting at the **USAA** Event. However, it is a violation of **USAA** policy for any such person who chooses to consume alcohol at any **USAA** Event to display any behavior or engage in any action that causes or may cause danger to themselves or others or damage to any property or which is unsportsmanlike, offensive or inappropriate for a representative of the **USAA**, the **USA** or the sport of archery.

Violations (or reasonable suspicions of violations) or abuse of this policy may be cause for disciplinary action up to and including termination.

Definition of Alcohol

Alcohol shall include all intoxicating beverages.

Definition of Controlled Substances

Controlled substances is defined as all non-prescription controlled substances, all illegal drugs, all prescription or prescribed controlled substances when used to an excess in violation of doctors' orders, to produce the state of intoxication in the participant or to enhance the performance of the participant, and all substances on the World Anti-Doping Agency's (WADA) recognized list of banned substances (which may be found at www.usantidoping.org). Tobacco is not considered a drug. In the event of a conflict between any federal and state or local law, the most strict law prohibiting the use of controlled substances shall apply. Prescription drugs required by any person that is a member of any traveling **USAA** or USOPC team during the course of the team's travel are not included in the definition of controlled substances so long as documentation by a physician and a Therapeutic Use Exemption form, have been filed in advance with **USAA**.

Examples of Prohibited Alcohol or Controlled Substance Consumption or Abuse

Examples of prohibited alcohol or controlled substance consumption or abuse include but are not limited to the following:

- Suggesting, encouraging, advising or condoning the use of controlled substances to enhance the performance of an athlete
- Sharing of prescription drugs with a teammate or other person that have not been prescribed for such person
- Reporting to work at **USAA** while taking prescription or over-the-counter drugs when the influence of such drugs would negatively affect such person's ability to perform their job duties safely and effectively or create an unsafe condition for other employees
- Drunk and disorderly behavior that endangers any person or damages any property at a **USAA** Event

In the event of any inconsistency between this policy and the Employee Handbook, the Employee Handbook shall control.

FALSE AND MALICIOUS ACCUSATIONS

Any person who makes a false and malicious complaint of a violation of this policy, as opposed to complaints, which, even if erroneous, are made in good faith, will be subject to disciplinary action

COMPLAINTS, INVESTIGATIONS AND DISCIPLINE

A person wishing to file a complaint may do so by contacting any of the following: any **USAA** officer or director, any Team Captain or Team Manager. All alleged violations of this policy will be submitted to a hearing panel appointed

by the **USAA** Board of Justice for resolution pursuant to the complaint procedures set forth in Article XV of the **USAA** By-Laws (available on the **USAA** website). If an alleged violation occurs when a team sponsored by **USAA** or the USOPC is traveling to or from, or participating at, a competition and it is necessary to expedite the proceeding in order to resolve a matter relating to the competition, such matter shall be resolved pursuant to the expedited procedures set forth in Section 15.10 of Article XV which require that such complaint shall be heard and decided within twenty-four (24) hours of the filing.

The hearing panel appointed by the Board of Justice will determine whether a violation of this policy has occurred and if so, what discipline is warranted. Such discipline may include immediate termination of employment, immediate dismissal from a training camp, **USAA** Event or program, **USAA** or USOPC sponsored team, being precluded from participating at **USAA** or USOPC sanctioned events or other competitions and being sent home at the such person's own expense.

FURTHER INFORMATION

For guidance and questions regarding the **USAA** Drugs and Alcohol Policy please contact the CEO of **USAA** at rmenger@usarchery.org



USAA SPORTSMANLIKE CONDUCT POLICY

POLICY STATEMENT

USA Archery (USAA) and its members are committed to acting in a sportsmanlike manner consistent with the spirit of fair play and responsible conduct. **USAA** and its members are also committed to fair competition and respect for the members of other teams, their coaches and staff as well as all spectators and others who participate at any event, training camp or competition sanctioned by **USAA** or the United States Olympic & Paralympic Committee (USOPC).

PROHIBITED CONDUCT

It is a violation of **USAA** policy for any **USAA** member to exhibit unsportsmanlike conduct at any **USAA** Event.

DEFINITION OF UNSPORTSMANLIKE CONDUCT

Unsportsmanlike Conduct is defined as any conduct that is inappropriate for an athlete, coach, judge or other official participating in a **USAA** Event, that evidences a lack of respect for such person's teammates, competitors, officials, spectators or the sport of archery, that intends to detract from the ability of a teammate or competitor to attain peak performance, that is not fitting behavior for a representative of the United States of America and the sport of archery or that is contrary to the generally understood principles of sportsmanship.

EXAMPLES OF UNSPORTSMANLIKE CONDUCT

Examples of Unsportsmanlike Conduct include but are not limited to the following:

- Openly disputing or arguing with any decision by a judge or other official
- Using obscene or vulgar language that detracts from the ability of a teammate or competitor to attain peak performance, even if it is not directed at a particular person
- Intentionally disrupting or distracting a competitor in the course of competition
- Intentionally inaccurate scoring of any round of shooting
- Taunting of competitors, coaches, officials or others by means of baiting, ridiculing, threatening physical violence or physical violence

FALSE AND MALICIOUS ACCUSATIONS

Any person who makes a false and malicious complaint of unsportsmanlike conduct, as opposed to complaints, which, even if erroneous, are made in good faith, will be subject to disciplinary action

COMPLAINTS, INVESTIGATIONS AND DISCIPLINE

A person wishing to file a complaint may do so by contacting any of the following: any **USAA** officer or director, any Team Captain or Team Manager. All alleged violations of this policy will be submitted to a hearing panel appointed by the **USAA** Board of Justice for resolution pursuant to the complaint procedures set forth in Article XV of the **USAA** By-laws (available on the **USAA** website). If an alleged violation occurs when a team sponsored by **USAA** or the

USOPC is traveling to or from, or participating in, a competition and it is necessary to expedite the proceeding in order to resolve a matter relating to the competition, such matter shall be resolved pursuant to the expedited procedures set forth in Section 15.10 of Article XV which require that such complaint shall be heard and decided within twenty-four (24) hours of the filing.

The hearing panel appointed by Board of Justice will determine whether a violation of this policy has occurred and if so, what discipline is warranted. Such discipline may include immediate termination of employment, immediate dismissal from a training camp, **USAA** Event or program, **USAA** or USOPC sponsored team, being precluded from participating at **USAA** or USOPC sanctioned events or other competitions and being sent home at the such person's own expense.

FURTHER INFORMATION

For guidance and questions regarding the **USAA** Sportsmanlike Conduct Policy please contact the CEO of USAA at rmnzenr@usarchery.org.



WHISTLEBLOWER POLICY

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 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 the Code of Ethics or Code of Conduct;
- Activities, which otherwise amount to serious improper conduct.

SAFEGUARDS

Harassment or Victimization - Harassment or victimization for reporting concerns under this policy will not be tolerated.

Confidentiality - Every effort will be made to treat the complainant's identity with appropriate regard for confidentiality.

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;
- 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), **USAA** CEO or Director of Finance & Operations.

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

Panel - Allegations will be addressed by a panel consisting of two (2) independent board members and the Chair of the Ethics Committee. 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.

Bad Faith Allegations - False and malicious allegations of harassment, discrimination or retaliation (as opposed to complaints that, even if erroneous, are made in good faith) may be the subject of appropriate disciplinary action.

Retaliation - Retaliation against an individual for reporting alleged misconduct or for participating in an investigation of the allegation is a serious violation of this policy and will be subject to disciplinary action. Acts of retaliation should be reported immediately and will be promptly investigated and addressed.

Questions – If you have questions or concerns about this policy you may speak with an immediate supervisor (if applicable), the **USAA** Director of Finance & Operations at cclark@usarchery.org or the CEO at rmenzer@usarchery.org.