



# WHISTLEBLOWER POLICY

UPDATED: DECEMBER 2024

## PURPOSE

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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.

Integrity and ethical conduct are and must be at the heart of USAA. USAA encourages all members of the USAA community, particularly athletes, to speak up on issues of concern, including where there may be an ethics violation, a violation of USAA policies, or law. Freedom to speak up means being able to raise concerns in whatever way is most comfortable and effective and feeling free to cooperate in investigations that follow. USAA has a zero tolerance policy for retaliation of any kind against people who speak up in good faith and will investigate all allegations of retaliation.

The USAA Code of Conduct requires reporting violations of that policy and it prohibits retaliation against people who do. This Whistleblower policy builds on those Code of Conduct principles and provides more specifics to guide all members of our community on how to speak up and help the organization grow stronger.

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

- Non-compliance with accounting and financial practices, to include incorrect financial reporting;
- Unlawful activity, to include non-compliance with state and federal law;
- Non-compliance with the Ted Stevens Olympic and Amateur Sports Acts ("the Sports Act"), USOPC Bylaws, sanctions, and policies;
- Non-compliance with the U.S. Center for SafeSport's ("the Center") Bylaws, Code, policies, temporary measures, safety plans, sanctions and/or procedures;
- Non-compliance with USAA Bylaws, policies, temporary measures, safety plans, sanctions and/or procedures;
- Activities, which otherwise amount to serious improper conduct.

There are some violations that **must** be reported. Specifically, any violations of local, state, or federal law or any violations of applicable athlete safety policies, including those of USAA and the U.S. Center for SafeSport, must be reported.

**Note that nothing in this Policy changes or replaces any mandatory reporting obligations under the SafeSport Code for the Olympic and Paralympic Movements.** Contact USAA's Athlete Safety

Division at [athletesafety@usarchery.org](mailto:athletesafety@usarchery.org) for assistance with any questions about those obligations. Additionally, suspected criminal activity against a person or property should be reported directly to law enforcement immediately.

## **SAFEGUARDS**

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### **DEFINITION OF RETALIATION**

Retaliation is defined by, but not limited to, Section 220501(b)(11) of the Sports Act. The Act states: Any adverse or discriminatory action, or the threat of an adverse or discriminatory action, including removal from a training facility, reduced coaching or training, reduced meals or housing, and removal from competition carried out against a Protected Individual as a result of any communication, including the filing of a formal complaint, by the Protected Individual or a parent or legal guardian of the Protected Individual relating to the allegation of physical abuse, sexual harassment, or emotional abuse, with the United States Center for SafeSport; a coach, trainer, manager, administrator, or official associated with the USOPC; the United States Attorney General; a federal or state law enforcement authority; the Equal Opportunity Employment Commission; or Congress.

### **RETALIATION IS PROHIBITED**

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.

In the event USAA finds that an employee has retaliated against a protected individual, that employee will be immediately terminated or suspended without pay as outlined in Section 220509(b)(5) of the Ted Stevens Act.

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**

In many cases, a reported matter will require investigation to reach the right resolution. Your cooperation as a reporter or otherwise may be very helpful and much appreciated. Reports will be treated as confidentially as possible; some information may have to be disclosed to certain parties to conduct a thorough investigation, to comply with the law, and to provide accused individuals access to due process.

If you report a matter anonymously and choose to remain anonymous as it is investigated, your report will be respectfully treated with the same attention as other reports. Note, however, that if you choose to remain anonymous, USAA will be limited in its ability to ask follow-up questions that may be essential to more fully investigating your report.

### **Bad Faith Allegations**

Bad Faith Allegations is defined as knowingly making a false report or a report in bad faith is a violation and should be reported as such; allegations made in bad faith may result in disciplinary action.

Just as we need to make sure that no one in our community is fearful of speaking up, we also need to make sure that no one in our community is fearful about false reports that might harm them.

With that in mind, anyone reporting a perceived ethical, policy, or legal violation must be acting in good faith and have some basis for believing there may be a violation. Anyone that makes a false report knowing that it is false or that it has no basis is violating this policy and the USAA Code of Conduct in the same way as someone retaliating against a good faith reporter. Such a violation may itself be reported under this policy and it may lead to serious consequences, including termination.

### **RETALIATION PROTECTION**

No employee, contractor, agent, volunteer, or USAA shall take or threaten to take any action against an athlete as a reprisal for disclosing information to or seeking assistance from the Office of the Athlete Ombuds as outlined in Section 220509(b)(5) of the Act.

## **PROCESS FOR RAISING A CONCERN AND HANDLING AN ALLEGATION**

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### **Reporting Options**

USAA has an open-door policy and encourages you to share your questions, concerns, suggestions, or complaints in the way and to the people you are most comfortable with. That means you have options for how to report any concern about a potential ethical, policy, or legal violation.

You can make a report to the Chair of the USAA Ethics Committee and/or Chair of the USAA Board of Directors or your USAA supervisor (if applicable). They are available to discuss your concern and help make sure it is addressed. If one of them is most comfortable for you to talk to in a particular situation, you can start there.

Individuals can submit reports to the following email addresses:

The Chair of the USAA Ethics Committee: [ethics@usarchery.org](mailto:ethics@usarchery.org).

The Chair of the USAA Board of Directors: [boardchair@usarchery.org](mailto:boardchair@usarchery.org).

If you wish to make a report anonymously, you may also use USAA's Online Athlete Safety Reporting Form [here](#).

Additionally, USAA Staff Members should discuss your concerns with your immediate supervisor, or CEO. Individuals may also submit their complaint to Insperty, USAA's Human Resources Provider. Contact information is listed in USAA's Employee Handbook.

Please remember that as a reporter you don't need to (and should not) investigate the matter you are concerned about or determine fault or how to fix it. You have done your part by making it known so that the right people can take action. Investigations of reports are discussed below.

Once you have made your report in one of the ways described above, the person you reported to is responsible for getting that report to the person who can best address your concern, based on the matter reported. In the case of a report that involves USAA employees, the CEO or their designee will investigate. In all cases, USAA is committed to ensuring that no good faith report goes unheard or ignored.

**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** – Once a report is received, allegations will be investigated in accordance with USAA's Disciplinary Proceedings and Grievance Policy by the CEO, or their designee.

In all cases, matters will be investigated by a disinterested party. If, after investigating to the extent warranted by the circumstances, the investigator concludes that the subject of a report has committed a violation under the governing policy, the subject of the report will be subject to discipline to the extent permitted by USAA's Disciplinary Proceedings and Grievance Policy.

USAA is committed to reviewing all incoming reports, but there may be occasions when USAA cannot conduct a full investigation and a report will be dismissed without investigation. Such circumstances include the reporter declining to participate in the investigation, an allegation that is not actionable by USAA, or insufficient evidence for an allegation such that an investigation is not warranted.

**Retaliation** - In the event that an investigation of potential retaliation finds that an employee of USAA has retaliated against an individual in response to any communication, including a formal complaint, from that individual (or their parent / legal guardian) related to an allegation of physical abuse, sexual harassment, or emotional abuse, USAA shall immediately suspend that employee without pay or terminate the employee as required by §220509(c)(2) of the Act.

The individuals responsible for the policy and the enforcement of the policy are as follows:

Chief Executive Officer, [ceo@usarchery.org](mailto:ceo@usarchery.org)

Chair of the Board of Directors, [boardchair@usarchery.org](mailto:boardchair@usarchery.org)

Chair of the Ethics Committee, [ethics@usarchery.org](mailto:ethics@usarchery.org)

Chair of the Board of Justice, [complaints@usarchery.org](mailto:complaints@usarchery.org)

### **Athlete Resources**

Team USA athletes may contact the Athlete Ombuds for independent and confidential advice on a variety of sport related matters, including their rights, applicable rules, policies or processes, and questions related to resolving disputes and grievances. The Athlete Ombuds can also help Team USA athletes connect with legal counsel or mental health resources if needed. All other USAA athletes (i.e., athletes competing domestically at the masters or youth level, recreational athletes, foreign athletes), are welcome to visit the Athlete Ombuds website to review informational resources and should work directly with USAA to understand additional resources and options available to them.

The Office of the Athlete Ombuds:

Phone: 719-866-5000

Website: [usathlete.org](http://usathlete.org)

Email: [ombudsman@usathlete.org](mailto:ombudsman@usathlete.org)

Individuals who wish to report concerns related to this policy as it relates to involvement in the Olympic and Paralympic Movement or are uncomfortable reporting a concern directly to USAA, may

also submit a report using the USOPC Integrity Portal. The Integrity Portal allows individuals to submit concerns to the USOPC confidentially and/or anonymously. Reports may be made online or by telephone.

Website: [usopc.ethicspoint.com](https://usopc.ethicspoint.com)

Hotline: 877-404-9935

**Confidentiality** - USAA will maintain confidentiality throughout the investigatory process to the extent consistent with adequate investigation and appropriate corrective action. Confidentiality provisions may be waived to comply with legal reporting requirements.

### **Follow Up**

If you report an alleged violation of ethics, USAA policy, or applicable laws, USAA will report back to you on progress and investigation results as appropriate. Confidentiality and legal obligations may affect the details available.

If the investigation of a report that was made in good faith is not to your satisfaction, then you have the right to report that, too.

