



WHISTLEBLOWER AND ANTI-RETIALIATION POLICY OF USA SHOOTING

Effective: April 8, 2024

1. Purpose

This Whistleblower and Anti-Retaliation Policy (the "Policy") is intended to support a strong culture of integrity and ethical conduct at USA Shooting ("USAS") by encouraging, valuing, and protecting good faith reporting by athletes, directors, officers, employees, members, committee members, task force members, hearing panel members, and volunteers ("Affiliated Individuals") of USAS of any alleged violation of any applicable law or policy or any potential ethics issue. This Policy also protects any good faith reporter and/or other reasonable parties (i.e., witnesses, victims). USAS will require, where reasonable, its contractors to comply with this Policy through their written contracts.

The 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. It also means that USAS has zero tolerance for retaliation of any kind against people who speak up in good faith.

2. Violations Covered by this Policy

This Policy is for use where there may be a violation of:

- any applicable State or Federal law, rule or regulation
- USAS Bylaws, polices or procedures
- principles of ethics
- accounting or financial practices (e.g., fraud)
- the Ted Stevens Olympic and Amateur Sports Act (the "Act")
- United States Olympic & Paralympic Committee ("USOPC") Bylaws and policies
- USAS's Code of Conduct

If an Affiliated Individual is unsure about whether a matter might be a policy violation or is unsure about their reporting responsibility for a particular type of matter, please start by reviewing the particular policy involved. USAS staff should refer to [Resource Center | USA Shooting](#) or reach out to the CEO or the CEO's designee for more information.

Also, keep in mind that some violations **must** be reported. Specifically, please be familiar with the requirements in the U.S. Center for SafeSport Code [Read the SafeSport Code | U.S. Center for SafeSport \(uscenterforsafesport.org\)](#) and USAS's Safe Sport Policies [Safe Sport | USA Shooting](#), [USAS's Financial Policy](#). And of course, if an Affiliated Individual suspects any criminal activity against a person or property, they should report this directly to law enforcement immediately.

An Affiliated Individual can seek representation as needed. Team USA athletes may contact the Office of 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 NGB 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 their NGB to understand additional resources and options available to them.

<https://www.usopc.org/athlete-ombuds>

Phone: 719-866-5000

Email: ombudsman@usathlete.org

Website: usathlete.org

Nothing in this Policy changes or replaces any mandatory reporting obligations under the SafeSport Code for the Olympic and Paralympic Movements – talk to the CEO or the CEO’s designee if you have any questions about those obligations.

3. Reporting

No Retaliation

USAS has an open-door policy and encourages 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.

USAS 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. “Retaliation” means 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:

- (a) the U.S. Center for SafeSport;
- (b) a coach, trainer, manager, administrator, or official associated with USOPC;
- (c) the Attorney General;
- (d) a Federal or State law enforcement authority;
- (e) the Equal Employment Opportunity Commission; or
- (f) Congress.



No employee, contractor, agent, volunteer, or USAS will take or threaten to take any action against an athlete as a reprisal for disclosing information to or seeing assistance from the Office of the Athlete Ombuds as outlined in Section 220509(b)(5) of the 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 USAS's Code of Conduct, and may lead to serious consequences including termination of employment or participation for anyone involved in retaliation.

How to Report

Affiliated Individuals may always report to a USAS staff member or their supervisor (if applicable). Or, the Affiliated Individual can make a report to the CEO or the CEO's designee. These are people who can also discuss the concern and help make sure it is addressed. Affiliated Individuals can also make reports to the Ethics Committee at Ethics@usashooting.org, Board member at Board@usashooting.org or other governance lead as designated by the USAS.

Please remember that as a reporter, Affiliated Individuals do not need to (and should not) investigate the matter of concern or determine fault or how to fix it. The Affiliated Individual does his or her part by making it known so the right people can take action. Investigations of reports are discussed below.

Acting in Good Faith

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, financial, 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 USA Shooting 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 of employment or participation.

4. Investigation

Once a report is made in one of the ways described above, the person receiving the report is responsible for managing it in a confidential manner and getting it to the person who can best address the concern, based on the matter reported and in keeping with other appropriate policies. In all cases, USAS is committed to ensuring that no good faith report goes unheard or ignored.

Legal@usashooting.org is responsible for coordinating among these people so that reporting individuals can be confident that reported concerns get to the people best positioned to act on them. They will report regularly to the USAS ethics committee.



So long as a conflict of interest does not exist, USAS's Ethics Committee investigate complaints of alleged violations under this Policy and make determinations on alleged violations, including any applicable athlete involvement. If the investigators have a conflict of interest upon initial review, and/or the USAS's Ethics Committee desires, USAS will use an outside, third-party professional who is disinterested to investigate the complaint. If upon investigation, USAS finds that an employee has retaliated against a protected individual, that person will be immediately terminated or suspended without pay as required by §220509(c)(2) of The Ted Stevens Olympic and Amateur Sport Act. 5 5.

Alleged violations may be dismissed without a full investigation in circumstances such as insufficient evidence, a reporting party not participating, etc.

5. Confidentiality

In many cases, a reported matter will need investigation in order to reach the right resolution. Cooperation as a reporting individual 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 in order to conduct a thorough investigation, to comply with the law, and to provide accused individuals access to due process.

If a matter is reported anonymously and the reporter chooses to remain anonymous as it is investigated, USAS will respect that.

6. Follow Up

If an Affiliated Individual reports an alleged violation of ethics, USAS policy, or applicable laws, USAS will report back to the Affiliated Individual on the progress and investigation results as appropriate. And of course, the Affiliated Individual is always free to follow up to learn more from the person they reported to. Confidentiality and legal obligations may affect the details available.

If an issue falls under a different policy, the investigation and follow up the procedures set forth in the appropriate policy shall govern. At no time will a conflicted individual be involved in the decision making process.

If the investigation of a report that was made in good faith is not to the satisfaction of the reporter, then the reporting individual may report that, too.

7. USOPC Integrity Portal Information

Any individual may report concerns confidentially, or anonymously, online using the USOPC Integrity Portal [EthicsPoint - USOPC](#). If preferred, individuals may call the USOPC Integrity Hotline at 877-404-9935 to report their concerns over the phone.



For additional reporting resources, including links to the reporting portals for the U.S. Center for SafeSport and USOPC's Office of Security and Athlete Safety, click [\[USOPC | Reporting A Concern\]](#)

Thank you for helping to ensure that USAS is a safe zone for speaking up in good faith on important matters.