



USA SHOOTING CONFIDENTIALITY POLICY

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1. Purpose

USA Shooting is committed to maintaining the confidentiality of information entrusted to its Board of Directors, committees, staff, athletes, volunteers, contractors, sponsors, and partners (collectively, "Covered Persons"). Confidentiality protects athletes and members, preserves competitive and business interests, and sustains trust in USA Shooting.

2. Applicability and Expectation

This policy applies to all Covered Persons during their service or engagement with USA Shooting and continues thereafter.

Covered Persons must not disclose, use, or permit the use of Confidential Information, as defined below, except as allowed under this policy or as required by law.

All Confidential Information is the exclusive property of USA Shooting.

Covered Persons shall not use Confidential Information for personal benefit or for the benefit of any third party and shall not permit its use in competition with USA Shooting.

Covered Persons should, at all times, use reasonable care to secure Confidential Information (secure storage, strong passwords and multi-factor authentication ["MFA"]), limit distribution, refrain from personal cloud uploads without authorization, and shall not copy, retain, or transport documents except as necessary for USA Shooting duties.

Further, upon written request by USA Shooting or upon separation of service with USA Shooting, Covered Persons shall promptly return or destroy within five (5) calendar days all materials containing Confidential Information (including copies, extracts, or notes) and certify completion in writing if requested.

If at any time, a Covered Person is notified of a legal hold, they shall retain and preserve specified materials notwithstanding routine destruction or a prior return/destruction request until further directed by Legal.

3. Definitions

Confidential Information: Non-public information obtained through one's role with USA Shooting, regardless of format (oral, written, electronic, or visual), including information generated by a Covered Person that contains, reflects, or is derived from such information.

Examples of USA Shooting Confidential Information (non-exhaustive):

- Strategic/operational/marketing/membership plans, data, and statistics whether in draft or final form.
- Financial information and projections; draft and final budgets; non-public performance results.
- Capital/facility plans; borrowing or asset decisions; expansions, closures, or other plans affecting competitive position.
- Product/service plans; vendor/partner/customer/supplier lists.
- Contract negotiations or terms, RFPs/RFQs, pricing.
- Personnel and Human Resource information (performance, evaluations, compensation, grievances, discipline).
- Risk-management strategies; incident reports; insurance; claims and litigation.
- Legal advice and attorney-client communications; other privileged/professional advice.
- Board/committee materials prepared for meetings; draft minutes; pre-decisional documents.
- Opinions expressed in meetings.
- Summarizations or characterizations of board or committee activities or decisions outside the Authorized Channels.
- Public or private statements about board, committee, or organizational actions that are not approved by the USA Shooting Chief Executive Officer ("CEO") (or designee) or that do not reflect official board policies or decisions, regardless of whether you personally agree or disagree with those policies or decisions.
- Executive Session discussions and materials.

- Any other information that should reasonably be recognized as confidential to USA Shooting or its governance.
- Any information a Covered Person generates that contains, reflects, or is derived from any of the foregoing.

This list specifically excludes documents or other information posted by USA Shooting on its website.

Executive Session: Board or Committee sessions closed to non-Board or non-Committee members, except when individuals are specifically requested to attend due to their topic-specific expertise.

Authorized Channels: Official, CEO approved pathways and roles for communicating USA Shooting information internally and externally.

Examples of Authorized Channels (non-exhaustive):

- Board Leadership: Board Chair or the Chair's designee (e.g., CEO) for approved statements on behalf of the Board.
- Executive/Organizational Leadership: CEO or the CEO's designee (e.g., Communications/PR) for organizational announcements, media responses, and public statements.
- Legal: General Counsel (GC) for legal and policy matters, subpoenas, regulatory inquiries, or threatened litigation.
- Committees: Committee members communicating with their committees and relevant staff, as appropriate, within the committee's chartered scope.
- Official USA Shooting systems: USA Shooting-designated platforms (as determined by the CEO, in consultation with General Counsel and/or Board leadership) for distributing and storing confidential materials (e.g., board portal, secure document systems, official USA Shooting emails (e.g. xxx@usashooting.org) and other official USA Shooting accounts). To the extent reasonably practicable, Covered Persons should use these official systems for Confidential Information.

4. Authorized Disclosures

In some circumstances, Confidential Information may be shared with others, but only through Authorized Channels, as defined above, unless approved by Legal or Ethics@usashooting.org.

Specifically, a Covered Person may:

- A. Disclose Confidential Information internally to sitting members of the Board or relevant committees, USA Shooting officers, employees, or legal counsel, provided they have a legitimate need to know.

B. Comply with mandatory reporting obligations outlined in USA Shooting Bylaws, Code of Conduct, the U.S. Center for SafeSport, or other USA Shooting Policies. Nothing in this policy restricts or discourages good faith reporting of potential SafeSport or USA Shooting policy violations through appropriate channels or reporting of any evidence of illegal activity or abuse to law enforcement/authorities. Such reporting is permitted and encouraged. No retaliation will be tolerated for good-faith reports.

If requested or required in any legal, judicial, or regulatory proceeding or investigation to disclose Confidential Information, a Covered Person shall, to the extent reasonably practicable and not prohibited by law/authority:

- Provide prompt written notice to the USA Shooting General Counsel so that USA Shooting may, at its sole cost, seek a protective order or other relief; and
- In the absence of a protective order, disclose only that portion of information the person is legally required to disclose, as advised by legal counsel while maintaining confidentiality of all remaining information.

5. Duty to Report Violations

In the event of alleged violations of this policy by any Covered Person, the matter shall immediately be referred to the Ethics Committee at Ethics@usashooting.org for investigation pursuant to USA Shooting Complaint/Grievance Policy and Hearing Procedures.

6. Potential Remedies

If a violation is found to have occurred by a Board or Committee Member, the Board may impose measures up to and including censure, suspension, or removal, as permitted by the USA Shooting Bylaws. Where feasible and consistent with the Bylaws, the Board will seek to conclude any removal vote within sixty (60) days after a final Ethics Committee ruling.

A violation by a USA Shooting employee or staff member may result in disciplinary action up to and including termination, consistent with employment policies and applicable law.

USA Shooting may seek injunctive or other equitable relief (temporary or permanent) to stop or prevent improper disclosure or use.

Nothing within this Policy shall limit USA Shooting's ability or obligation to cooperate with the U.S. Center for SafeSport, U.S. Olympic & Paralympic Committee ("USOPC"), International Shooting Sport Federation ("ISSF"), World Shooting Para Sport ("WSPS"), or law enforcement.

7. Resources

If uncertain whether information is confidential, promptly consult Compliance@usashooting.org or the Ethics Committee at Ethics@usashooting.org.