



USA SHOOTING WHISTLEBLOWER AND ANTI-RETALIATION POLICY

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1. Purpose

The USA Shooting Whistleblower Policy (the Policy) is intended to support a strong culture of integrity and ethical conduct at USA Shooting by encouraging, valuing, and protecting good faith reporting of concerns involving USA Shooting and those affiliated with USA Shooting. The Policy covers good faith reporting of concerns of all kinds related to USA Shooting and includes anti-retaliation protections for those who report in good faith and/or cooperate with an investigation of such reports, like witnesses and victims.

Every person—including athletes, employees, board members and officers, members, committee members, task force members, hearing panel members, volunteers, and others affiliated with USA Shooting (“Affiliated Individuals”)—has the right to report concerns and alleged violations in a way that is comfortable for them and cooperate in any investigations that follow without fear of retaliation.

2. Policy Coverage

The Policy covers reporting of any alleged violation of applicable law, policy, or procedures as well as potential ethical misconduct. Examples of alleged violations that may be reported under the Policy include, but are not limited to non-compliance with:

- a) the Ted Stevens Olympic and Amateur Sports Act
- b) Applicable provisions of the United States Olympic and Paralympic Committee (“USOPC”) Bylaws or policies

- c) International Shooting Sports Federation (“ISSF”) Integrity Code or ISSF Regulations Safeguarding against Harassment and Abuse and similar World Shooting Para Sport (“WSPS”) policies that may be applicable
- d) USA Shooting’s Bylaws, policies, or procedures
- e) Applicable Federal or State laws
- f) Accepted accounting or financial practices (e.g., fraud)

Any violations of local, state, or federal law or any violations of applicable athlete safety policies, including those of USA Shooting and the U.S. Center for SafeSport, **must** be immediately reported.

Further, pursuant to USA Shooting’s Bylaws, Code of Conduct, Athlete Safety Policy, Sports Integrity Policy, Confidentiality Policy, Gifts and Entertainment Policy, Financial Policy and Employee Handbook, there are certain behaviors that **must** be immediately reported. Each Affiliated Individual is responsible for reviewing and complying with all USA Shooting disclosure requirements.

Note that nothing in this Policy changes or replaces any mandatory reporting obligations under the SafeSport Code for the Olympic and Paralympic Movements. Ethics@usashooting.org can assist with any questions about those obligations. Additionally, suspected criminal activity against a person or property should be reported directly to law enforcement immediately.

If you are unsure about whether a matter might be a policy violation or are unsure about your reporting responsibility for a particular type of matter, start by reviewing the particular policy involved or reach out to the USA Shooting CEO or the Chair of the USA Shooting Ethics Committee at Ethics@usashooting.org for more information. USA Shooting staff should refer to the USA Shooting Employee Handbook or reach out to the USA Shooting CEO or Ethics@usashooting.org for more information.

3. Reporting

There are several ways an individual may make a report under this Policy.

- a) Reporters may submit a report to Ethics@usashooting.org. This mailbox is monitored by independent ethics, compliance or legal experts who will route reports to the right party to address the concerns.
- b) Reporters may also submit a report to the [USOPC Integrity Portal](#).

Please remember that as a reporter, you do not need to (and should not) investigate the matter of concern, determine fault, or know how to remedy the situation. A reporter does his or her part by making an issue known so the right people can take action.

4. Investigation and Resolution

Once a report is received, it will be forwarded to the party responsible for investigation. Investigations of reports of potential violations will be managed according to the USA Shooting Complaint/Grievance Policy and Hearing Procedures.

In all cases, a disinterested party will investigate matters. 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, such individual will be subject to discipline to the extent permitted by the USA Shooting Complaint/Grievance Policy and Hearing Procedures.

USA Shooting is committed to reviewing all incoming reports, but there may be occasions when USA Shooting cannot conduct a full investigation and a report may be dismissed without investigation. Such circumstances include, without limitation, the reporter declining to participate in the investigation, an allegation that is not actionable by USA Shooting, or insufficient information in a report such that an investigation is unable to be conducted.

5. Anti-Retaliation Provisions

USA Shooting has zero tolerance for retaliation against people who make good faith reports under this Policy or those who cooperate with investigations of those reports. Retaliation, for the purposes of this Policy, is defined as any adverse or discriminatory action, or the threat of an adverse or discriminatory action, carried out against an athlete, employee, board member or officer, committee member, task force member, hearing panel member, volunteer, or others associated with USA Shooting as a result of any report, complaint, formal or otherwise, or other communication reporting alleged misconduct of any kind to the U.S. Center for SafeSport, USA Shooting, including a coach, trainer, manager, administrator, or official associated with the corporation, the USOPC, the Office of the Athlete Ombuds, any federal or state law enforcement agency or government entity, including but not limited to the Attorney General, the Equal Employment Opportunity Commission, Congress, or employees of such organizations. Examples of adverse or discriminatory actions that would be considered retaliatory include, but are not limited to:

- Removal from a training facility
- Reduced coaching or training
- Reduced meals or housing
- Removal from competition
- Reduced opportunities for employment or advancement
- Isolating or bullying, whether in person or electronically

In addition, neither USA Shooting, nor any of its Affiliated Individuals, 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.

In the event that an investigation of potential retaliation finds that an employee of USA Shooting 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, USA Shooting shall immediately suspend that employee without pay or terminate such individual's employment.

In the event that an investigation of potential retaliation finds that another USA Shooting Affiliated Individual 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, USA Shooting shall immediately take action against the Affiliated Individual as outlined in USA Shooting Bylaws, Code of Conduct, or Complaint/Grievance Policy and Hearing Procedures.

6. Good Faith

This Policy protects anyone acting in good faith and having some basis for believing there may be a perceived ethical, policy, financial or legal violation. Anyone that makes a false report knowing that it is false or that it has no basis is violating this Policy. Such a violation may itself be reported under this Policy and it may lead to serious consequences, including termination of employment, participation, membership, or other appropriate remediation.

7. Confidentiality and Anonymity

USA Shooting will make every effort to keep the identities of the reporting parties and witnesses confidential. However, disclosure of an individual's identity or identifying information may be required in some cases, such as where USA Shooting is required by law to report a matter to law enforcement.

If a matter is reported anonymously and the reporter chooses to remain anonymous as it is investigated, USA Shooting will respect that. USA Shooting will review all reports with the same level of attention, but if a reporter chooses to remain anonymous, USA Shooting may be limited in its ability to fully investigate a report.

8. USA Shooting Resources

The USA Shooting Ethics Committee is responsible for this policy and its enforcement. The USA Shooting Ethics Committee can be contacted with any questions about this policy at Ethics@usashooting.org.

9. Additional Resources

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 USA Shooting, 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
Hotline: 877-404-9935

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 National Governing Body ("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.

Email: ombudsman@usathlete.org
Website: www.usathlete.org