



UNITED STATES ASSOCIATION OF BLIND ATHLETES ATHLETE WHISTLEBLOWER POLICY

The United States Association of Blind Athlete's (USABA) Code of Conduct, Statement of Ethics and Membership Agreement ("Code") requires all participants in USABA activities to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. As members of USABA, we all must practice honesty and integrity in fulfilling our responsibilities and comply with all applicable laws and regulations.

Specifically, the Code requires compliance with the Ted Stevens Olympic and Amateur Sports Act, the USOPC Bylaws, all USABA policies and procedures, and state and federal laws.

It is the responsibility of all members and those who serve USABA (including athletes, Board members, Committee members, task force members, volunteers, hearing panel members and others) to comply with the Code and to report violations or suspected violations in accordance with this Whistleblower Policy. [The Whistleblower Policy also applies to employees as set out in the Employment Manual.]

No individual who in good faith reports a violation of the Code shall suffer harassment, retaliation or adverse membership consequences. "Retaliation" as used in this policy includes threatening, intimidating, harassing, coercing or any other conduct that would discourage a reasonable person from engaging or participating in USABA's activities or processes when the action is reasonably related to the report or engagement with USABA. Retaliation may be present even where there is a finding that no violation occurred, but "retaliation does not include good-faith actions lawfully pursued in response to a report of a violation.

An individual who retaliates against someone who has reported a violation in good faith is subject to discipline up to and including termination of membership. This Whistleblower Policy is intended to encourage and enable members and others to raise serious concerns within USABA prior to seeking resolution outside the organization.

The Code supports the organization's open-door policy and suggests that members share their questions, concerns, suggestions or complaints with someone who can address them properly. In most cases, the best initial contact is the Chair of the Nominating and Governance Committee, who is USABA's Compliance Officer. The Compliance Officer has specific and exclusive responsibility to investigate all reported violations. For suspected fraud, or when you are not satisfied or uncomfortable with following USABA's open door policy, individuals should contact the Chair of the USABA Board of Directors.

The organization's Compliance Officer is responsible for investigating and resolving all reported complaints and allegations concerning violations of the Code and, at his/her discretion and advise the Chair of the Board of Directors. The Compliance Officer has direct access to the audit committee of the board of directors and is required to report to the audit committee at least annually on compliance activity.



The Nominating and Governance Committee of the board of directors shall address all reported concerns or complaints regarding corporate accounting practices, internal controls or auditing. The Compliance Officer shall immediately notify the Nominating and Governance Committee of any such complaint and work with the committee until the matter is resolved.

Anyone filing a complaint concerning a violation or suspected violation of the Code must be acting in good faith and have reasonable grounds for believing the information disclosed indicates a violation of the Code. Any allegations that prove not to be substantiated, and which prove to have been made maliciously or knowingly to be false, will be viewed as a serious disciplinary offense.

Violations or suspected violations may be submitted on a confidential basis by the complainant or may be submitted anonymously. Reports of violations or suspected violations will be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation.

The Compliance Officer will notify the sender and acknowledge receipt of the reported violation or suspected violation within five business days. All reports will be promptly investigated, and appropriate corrective action will be taken if warranted by the investigation. The investigation and corrective action (if any) will be undertaken and imposed by disinterested persons.