

2025 USOPC AND NGB ANNUAL COMPLIANCE REPORT

Overview

Consistent with the Ted Stevens Olympic and Amateur Sport Act's (the Act) compliance reporting requirements,¹ this report summarizes the Compliance and Audit team's initiatives as part of the USOPC's responsibility to ensure USOPC and NGB compliance with the Act, and the USOPC's bylaws, policies, and procedures. Part one of this report summarizes USOPC compliance initiatives, including the USOPC's efforts to adhere to standards it requires of NGBs and its Compliance risk assessment. The second part of the report summarizes the Compliance and Audit team's annual work on NGB audits, NGB certification renewals, NGB applications, and Compliance investigations. This portion of the report also outlines significant steps the Compliance and Audit teams have taken to support NGBs' compliance efforts.

I. USOPC Compliance

USOPC and IMS Compliance Audit

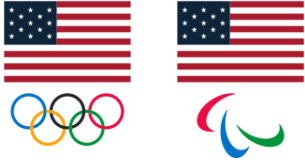
The USOPC Audit team completed its first compliance audit of the USOPC, auditing the USOPC and its Internally Managed Sports (IMS) against USOPC Compliance Standards that were developed based on NGB Compliance Standards, the Act, and the USOPC's bylaws, policies, and procedures. This audit demonstrated the importance the USOPC placed on holding itself to substantially the same standards as NGBs, and the USOPC committed to conducting a compliance audit at least once every four years as it does for NGB audits.

The compliance audit included two parts: an organizational audit of the USOPC and an audit of IMSs. The organizational audit resulted in seven findings, and the IMS audit resulted in six findings. Representatives from USOPC departments and from the IMS team submitted remediation plans at the end of 2025, and the USOPC Audit team will evaluate the remediation submissions to determine whether the USOPC and IMSs sufficiently addressed the audit findings.

Compliance Risk Assessment

The Compliance team worked with outside counsel to conduct a compliance risk assessment to measure the USOPC's compliance with applicable law and the compliance program's effectiveness, and to identify and measure any risks to the organization. The review resulted in identification of areas that require more immediate attention, including the need to centralize background check processes, developing guardrails for the use of artificial intelligence, enhancing controls relating to contracting with third parties, and centralizing the contracting and procurement function, all of which have been reported to senior management. The Compliance team will work with other USOPC departments to ensure findings from the risk assessment are timely addressed and will continue to provide progress updates to the USOPC's Ethics & Compliance Committee and senior management.

¹ 36 U.S.C. § 220511(a)(2)(F)-(G).



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Sport Integrity

Ahead of the Olympic and Paralympic Games Milan/Cortina 2026, the Compliance team revised the USOPC's Sports Betting Policy. It also provided training to athletes and staff selected to participate in the Olympic and Paralympic Games, as well as all USOPC staff. These trainings, which covered sports betting, match manipulation, and sharing insider information, are incorporated into a long-term ethics and compliance training strategy that includes delegation event-specific training and periodic training on core compliance topics such as conflicts of interest and retaliation. The training also provided athletes and staff with information about how to report concerns related to sport integrity, including to the International Olympic Committee, the International Paralympic Committee, and the USOPC's Integrity Portal. The USOPC also engaged an outside vendor to provide betting monitoring services for the Olympic and Paralympic Games and other national and international championships.

Reports of Retaliation

On October 21, 2025, the USOPC received a report from an athlete with USA Triathlon alleging that coaches at USA Triathlon had retaliated against him or her for filing a report with the U.S. Center for SafeSport. The reporter also reported the matter to USA Triathlon, who engaged independent counsel to review the allegations.

II. *NGB Compliance*

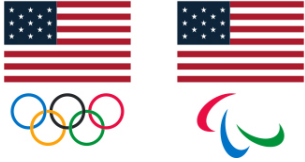
NGBs continued to make significant progress in meeting the NGB Compliance Standards, closing a total of 140 audit findings in 2025. In the fifth full year of conducting NGB compliance audits, the Audit team to see the number of findings decrease, which demonstrates that NGBs have required policies and procedures in place, and that they continue to implement important requirements that enable NGBs to better support athletes.

The Compliance and Audit teams also continue their commitment to providing support to NGBs through the Compliance Assistance Program, quarterly meetings hosted by both teams highlighting common findings and best practices, and governance support. The sections below summarize highlights of the Audit and Compliance teams' work throughout 2025, as well as the year's NGB certification renewals.

NGB Audit

The Audit team issued 19 NGB audit reports in 2025 before those NGBs' scheduled certification renewals. The Audit team also conducted three audits of NGB candidates in advance of the USOPC's Certification Review Group's recommendations to the NGB Oversight and Compliance Committee and Board of Directors. The most common issues identified in those audits fell into the categories of athlete representation, conflicts of interest, grievance / complaint procedures, and athlete safety requirements related to background checks. The Audit team continued to work closely with the Compliance team to ensure NGBs had sufficient time to remediate audit findings before the issuance of certification renewal reports, so the reports fully reflect the NGBs' compliance efforts.

In 2025, the Audit team benefited from the Compliance Assistance Program, which conducts reviews of publicly available sources and helps prepare NGBs for audits. This program continues to demonstrate the



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value of the Compliance Assistant Program, builds trust with NGBs, reduces the time it takes to complete audits, and reduces the number of findings, thereby streamlining the entire audit process.

New Sport Onboarding

Continuing work that began in 2024, the Compliance team collaborated with other USOPC departments on plans for the successful onboarding of certified NGBs for the three new sports added to the program of the Olympic Games Los Angeles 2028 (LA28) that did not have existing certified NGBs: flag football, lacrosse, and cricket.

The USOPC's NGB Candidate for the sport of flag football, USA Football, completed the certification review process in early 2025. The USOPC Board of Directors ultimately accepted the recommendation of the Certification Review Group (CRG) and certified USA Football as an NGB in April 2025.² The USOPC opened an application for NGB certification for the sport of lacrosse in May 2025 and the CRG selected USA Lacrosse as an NGB Candidate. The certification review process for USA Lacrosse is ongoing and will conclude in early 2026. Based on the lack of potential candidate organizations that demonstrated the capabilities necessary to become a certified NGB, the USOPC did not open NGB certification application for cricket in 2025. Instead, the USOPC and the International Cricket Council, the international federation for the sport, will work together to support the men's and women's national teams on the road to LA28 in the absence of an NGB.

Compliance Assistance Program

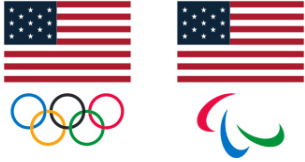
The USOPC Compliance team continued its Compliance Assistance Program in 2025. The Compliance Assistance Program includes three pillars: Audit Preparation, Compliance Check-Ins, and providing compliance-related resources for NGBs. The Compliance Assistance Program is a resource for NGBs – to the extent that active NGB participation is required in portions of the program, NGBs are invited to participate at the level that fits their needs and available resourcing.

In 2025, the Compliance team provided its full suite of Audit Preparation services to eight NGBs in anticipation of their upcoming compliance audits. The team again issued its Compliance Scorecards to all 51 NGBs as part of the Compliance Check-In program, adjusting the scope and methodology of the Scorecards to incorporate both changes to the NGB Compliance Standards for 2025 and NGB feedback on the process. Finally, the Compliance team updated the resources available to NGBs for annual reporting and policy drafting, most notably publishing an all-new template for an NGB sport integrity policy.

Compliance Investigations

The Compliance team conducted a number of investigations and inquiries in 2025 that substantiated concerns reported to the USOPC. The Compliance team reviewed concerns related to, among other things: whether an NGB retaliated against members for raising good-faith concerns regarding NGB governance; whether NGBs had processes in place to sufficiently disclose and manage conflicts of interest; whether NGBs had properly constructed Boards and Committees; whether an NGB was meeting its requirement to have an

² Additional details about the certification of USA Football are provided in the NGB Certification section of this report.



equitable grievance process; and whether an NGB complied with the Act's requirements to timely communicate clear selection procedures and consistently apply them.

At the conclusion of its reviews, the Compliance team issues letters to the relevant NGBs outlining the Compliance team's findings and requiring (where appropriate) specific action to address them. The Compliance team also includes (where appropriate) recommendations to NGBs to further strengthen their governance practices and their support of athletes, and informed NGB boards that they were responsible for overseeing the implementation of those recommendations if the NGB chose to adopt the recommendations.

The Compliance team continues to provide quarterly summaries of investigations and other significant NGB issues to the NGB Oversight and Compliance Committee and to the board of directors. The Chief Ethics and Compliance Officer also notifies USOPC leadership, the board chair, and NGB Oversight and Compliance Committee chair of any matters that may require immediate attention, such as significant financial distress that may result in bankruptcy or serious governance deficiencies that may warrant decertification.

NGB Certification

1. Certification Renewals

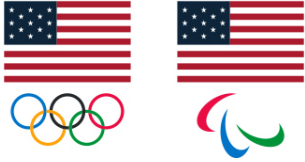
The USOPC Board of Directors accepted the CRG's recommendations and renewed the certifications of 15 NGBs. The full certification recommendation reports for these NGBs, and all NGBs, are available on usopc.org.

Renewal in Good Standing

The USOPC Board of Directors renewed 13 NGBs' certifications with a status of Renewal in Good Standing, indicating that there are no significant outstanding issues affecting the NGBs' standing with the USOPC. While the CRG identified some areas of concern in its review of these NGBs, there were no significant deficiencies, and the NGBs acted to resolve the issues identified by the CRG within the certification review period.

The NGBs whose certifications were renewed with a status of Renewal in Good Standing in 2025 were:

- National Wheelchair Basketball Association
- US Association of Blind Athletes
- US Biathlon
- US Bowling Congress
- US Squash
- US Tennis Association
- USA Baseball
- USA Basketball
- USA Climbing
- USA Diving
- USA Field Hockey
- USA Racquetball



- USA Roller Sports

Renewal with Conditions

The USOPC Board of Directors renewed the certifications of two NGBs with a status of Renewal with Conditions based on outstanding issues these NGBs must resolve before they can be considered in good standing.

The NGBs whose certifications were renewed with a status of Renewal with Conditions in 2025 were:

- USA Curling
- USA Water Ski & Wake Sports

Upgraded Conditional Certification Renewals

The USOPC Board of Directors upgraded previously issued conditional certifications of eight NGBs, moving the NGBs' statuses from Renewal with Conditions to Renewal in Good Standing based on their successful completion of all outstanding issues from their conditional certification renewals.

The NGBs whose certifications were upgraded from Renewal with Conditions to Renewal in Good Standing in 2025 were:

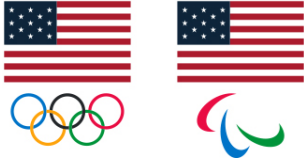
- US Figure Skating
- US Ski & Snowboard
- US Speedskating
- USA Luge
- USA Pentathlon Multisport
- USA Rugby
- USA Shooting
- USA Softball

Continued Conditional Certification Renewals

The USOPC Board of Directors approved continued Renewal with Conditions status for two NGBs based on the NGBs' failure to meet the conditions of their initial certification renewal within the time period specified in the initial certification renewal reports.

The NGBs whose Renewal with Conditions certifications were held over for additional remediation work in 2025 were:

- USA Curling
- USA Water Ski & Wake Sports



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2. New Certifications

In 2025, the USOPC Board of Directors accepted the CRG’s recommendation to certify USA Football as a national governing body for the sport of flag football, which will appear on the program of the Olympic Games Los Angeles 2028. The USOPC Board of Directors certified USA Football with a status of Certified with Conditions, signifying that USA Football had met the majority of the NGB Compliance Standards and was prepared to operate as an NGB, but that there were some areas in which the CRG needed additional time to assess USA Football’s performance before the organization could be considered to be in good standing.

3. Decertification

By way of background, in October 2024, the USOPC initiated decertification proceedings against USA Badminton based on concerns with its continued failings related to governance, including timely imposition of SafeSport sanctions; the board of directors’ lack of oversight of the chief executive officer; the failure of the board to meaningfully review and examine financial reports and budgets; and USA Badminton’s repeated inability to remediate over 14 audit findings that reflected significant non-compliance with the NGB Compliance Standards. In place of a hearing that was originally scheduled for April 2025, USA Badminton agreed to relinquish its certification if it could not meet requirements outlined in a Settlement Agreement that provided the organization with an additional 90 days to remedy long-standing compliance deficiencies. Based on USA Badminton’s inability to satisfy those requirements, the USOPC decertified the organization. The USOPC assumed responsibility for the Olympic and Paralympic High Performance programs following USA Badminton’s decertification and worked with the Badminton World Federation to identify a long-term solution that provides the best support for athletes and the sport in the United States.