

# USA GOLF Federation, Inc.

## Policy on Corporate Accountability

### 7.1.23

#### 1. Purpose and Application

The USA Golf Policy on Corporate Accountability (the **Policy**) is intended to support a strong culture of integrity and ethical conduct at USA by encouraging, valuing, and protecting good faith reporting of concerns involving USA Golf and those affiliated with USA Golf. The Policy covers good faith reporting of concerns of all kinds related to USA Golf 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, officers, board members and, officers, members, committee members, task force members, hearing panel members, volunteers, contractors, and others affiliated with USA Golf (the “**Constituents**”)—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 for reporting or speaking to USA Golf or any other entity about USA Golf.

#### 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:

- a) Non-compliance with the Ted Stevens Olympic and Amateur Sports Act
- b) Non-compliance with applicable provisions of the USOPC Bylaws or policies
- c) Non-compliance with USA Golf’s Bylaws, policies, or procedures
- d) Non-compliance with applicable Federal or State laws
- e) Non-compliance with accepted accounting or financial practices (e.g., fraud)

#### 3. Reporting

All Constituents have a duty to help USA GOLF identify ethics and compliance issues and promptly report any potential misconduct or violation of this Policy, the USA GOLF Code of Conduct, or athlete safety violations. Athlete safety violations must be reported, but nothing in this Policy changes or replaces any mandatory reporting obligations under the SafeSport Code for the Olympic and Paralympic Movements. Each Constituent should immediately notify their supervisor

with any concern that another Constituent is about to violate or has violated this Policy. If for any reason a Constituent is uncomfortable approaching their supervisor (for example, if the supervisor is the person that may be violating this Policy) or feels that the matter is not being adequately addressed, the Constituent should immediately bring the matter to the attention of the Executive Director of USA GOLF ([andylevinson@pgatourhq.com](mailto:andylevinson@pgatourhq.com)) or the Legal Counsel for USA GOLF ([yaredalula@pgatourhq.com](mailto:yaredalula@pgatourhq.com)), and the Board Chair ([andypazder@pgatourhq.com](mailto:andypazder@pgatourhq.com)).

USA GOLF will take any report of any violation of this Policy very seriously. USA GOLF will investigate the report promptly and take any appropriate corrective action as it deems necessary under the circumstances. USA GOLF will make every effort to conduct an investigation as confidentially as possible but cannot guarantee complete confidentiality, particularly as it may be required to make certain disclosures in order to conduct a full and thorough investigation, to comply with the law, and to provide accused individuals access to due process.

#### **4. Investigation and Resolution**

Once a report is received, it will be forwarded to the responsible party for investigation. So long as a conflict of interest does not exist, USA GOLF's senior counsel will investigate complaints of alleged violations under this Policy and make determinations on alleged violations, including any applicable athlete involvement. If investigators have a conflict of interest upon initial review, USA GOLF will use an outside third-party professional who is disinterested to investigate the complaint.

In all cases, matters will be investigated by a disinterested party. 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, the subject of the report will be subject to discipline including, but not limited to termination of employment or participation with USA Golf.

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

#### **5. Retaliation:**

No disciplinary or other retaliatory\* action will be taken against any Constituent for reporting or participating in good faith in an investigation of a potential violation of this Policy. If a Constituent believes they have been subject to retaliation in violation of this policy, the Constituent should report such immediately to the Executive Director of USA GOLF or the Legal Counsel for USA GOLF. Any Constituent who engages in any retaliatory conduct in violation of this Policy will be subject to disciplinary action up to and including termination.

\*Retaliation: Consistent with Section 220501(b)(11) of the Act, retaliation includes, but it not limited to, 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 Center;

- (B) a coach, trainer, manager, administrator, or official associated with the corporation;
- (C) the Attorney General;
- (D) a Federal or State law enforcement authority;
- (E) the Equal Employment Opportunity Commission; or
- (F) Congress.

In addition, no Constituent nor USA Golf 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.

## **6. Employment Suspension/Termination.**

As required by Section 220509(c)(2) of the Act, if it is found that a USA Golf Employee has retaliated against a Protected Individual (or their parent / legal guardian), the employee will be immediately terminated or suspended without pay. This action shall be warranted upon a final determination of retaliation.

## **7. Good Faith**

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. Such a violation may itself be reported under this Policy and it may lead to serious consequences, including termination of employment or participation.

## **8. Points of Contact.**

Individuals in need of further information, guidance and/or enforcement in relation to this Policy may contact the following:

Executive Director Email: [andylevinson@pgatourhq.com](mailto:andylevinson@pgatourhq.com)

Legal Counsel Email: [yaredalula@pgatourhq.com](mailto:yaredalula@pgatourhq.com)

The USOPC Ethics & Compliance team can serve as a secondary resource for questions or concerns regarding this Policy. The USOPC Ethics & Compliance team may be contacted at:

Integrity Hotline: 877.404.9935

Integrity Portal: <https://usopc.ethicspoint.com>

### **For Athletes with Questions Regarding this Policy:**

The Athlete Ombuds provides cost-free, independent, and confidential advice regarding athlete rights, resolving disputes or grievances; and any sport rule, policy, or process, including NGB-athlete agreements, codes of conduct, or team selection procedures. The Athlete Ombuds can also help athletes connect with legal counsel or mental health resources if needed. Athlete may contact the Athlete Ombuds at:

PHONE: (719) 866-5000

EMAIL: [ombudsman@usathlete.org](mailto:ombudsman@usathlete.org)

WEBSITE: [www.usathlete.org](http://www.usathlete.org)

