WHISTLEBLOWER AND ANTI-RETALIATION POLICY

Covered Individuals: This Policy applies to all US Fencing Association ("USFA") Members, employees, officers, athletes, members of the Board of Directors, Committee and Task Force Members, members of Hearing Panels, volunteers, and contractors who have been required to adhere to this Policy through their written contracts with USFA ("Covered Individual"). In addition, this Policy applies and protects any good faith reporter of alleged misconduct and any person who participates or is involved in the investigation or adjudication of claims of misconduct ("Covered Third-Persons")

General Statement: The USFA's Codes of Conduct requires all participants in USFA activities to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. As members of USFA, we all must practice honesty and integrity in fulfilling our responsibilities and comply with all applicable laws and regulations. Specifically, compliance with the Ted Stevens Olympic and Amateur Sports Act, the USOPC Bylaws, all USFA bylaws, policies, and procedures, and local, state, and federal laws.

Reporting Rights and Protections: It is the right of all Covered Individuals and Covered Third-Persons to avail themselves of the protection of USFA Codes of Conduct and other laws and policies, and to report violations or suspected violations in accordance with this Whistleblower Policy. For purposes of this Policy, "violations" includes violations of:

A. USFA's Bylaws, policies, and procedures
B. The Ted Stevens Olympic and Amateur Sports Act
C. USOPC Bylaws and policies
D. Accounting or financial fraud or malfeasance
E. Applicable local, state, and federal laws

No individual who in good faith reports a violation of the Codes of Conduct shall suffer harassment, retaliation or adverse membership consequences. "Retaliation" as used in this policy means 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 relating to the allegation of physical abuse, sexual harassment, or emotional abuse with (a) the US Center for SafeSport (b) a coach, trainer, manager, administrator, or official associated with

the corporation (c) the Attorney General (d) a Federal or State law enforcement agency (e) the Equal Employment Opportunity Commission or (f) Congress.

Nothing in this Policy changes or replaces any mandatory reporting obligations under the US Center for SafeSport Code for the Olympic and Paralympic Movements (the "Center "). Covered Individuals must report alleged violations of this Policy, including alleged violations of local, state, or federal law, in accordance with the reporting procedures set forth in this Policy.

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. In addition, no Covered Individual nor USFA itself 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 as outlined in the Ted Stevens Act, Section 220509(b)(5).

Just as USFA must ensure that individuals are not fearful of speaking up about suspected misconduct or violations, it must also protect individuals from knowingly false or bad-faith reports that may cause harm. Any person making a report under this Policy must do so in good faith and have a reasonable basis for believing that a violation may have occurred. A report will not be considered false or made in bad faith merely because an investigation does not substantiate the allegations or determines that no violation occurred. Knowingly making a false report, intentionally providing materially false or misleading information, or making a report without a genuine belief that the reported conduct may constitute a violation of this Policy may itself constitute a violation of this Policy and may result in disciplinary action under USFA's applicable policies and procedures. This provision is not intended to discourage or penalize good-faith reporting.

An individual who retaliates against someone who has reported a violation in good faith or a Covered Third-Persons 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 USFA prior to seeking resolution outside the organization.

Enforcement: The Grievance and Discipline Committee is responsible for investigating and resolving all reported complaints and allegations concerning violations of this Policy. Complaints or information concerning 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.

All reports will be reviewed under USFA's Complaint and Hearing Procedures. The investigation and corrective action (if any) will be undertaken and imposed by disinterested persons.

Enforcement with Respect to Employees: If the NGB finds an employee has retaliated against a Protected Individual, that person will be immediately terminated or suspended without pay pursuant to the requirements of the Ted Stevens Act.

Resources: Covered Individuals may submit a complaint through USFA's reporting portal. Covered Individuals may also contact Jess Saxon, General Counsel at j.saxon@usafencing.org and/or Morgan Boland, Member Safety & Organizational Compliance Coordinator at m.boland@usafencing.org with questions or complaints. Athlete members also may contact the athlete representative(s) to the Board of Directors as well as the Athletes Advisory Council Representative.

Specific to the Olympic and Paralympic Movement: 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 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

Individuals who wish to report concerns related to this policy as it relates to involvement in the Olympic and Paralympic Movement 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