



USA PENTATHLON, INC.

Whistleblower Protection Policy

Updated July 2026

1. Overview

USA Pentathlon Inc. (dba USA Pentathlon Multisport (USAPM)) requires affiliated members, board members, directors, officers, employees, staff, volunteers, athletes, committee members, hearing panel and task force members, contractors (where applicable) and members (collectively, the “affiliated members”) to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. As representatives of USAPM we must practice honesty and integrity in fulfilling our responsibilities and comply with all applicable laws and regulations. All good faith reporters or other reasonable parties (i.e. witnesses and victims) are protected under the policy. All contractors shall be required, where reasonable, to comply with the whistleblower and anti-retaliation policy through their written contracts.

2. Retaliation

As defined in Section 220501(b)(11) of the Act, 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 the United States Center for SafeSport; a coach, trainer, manager, administrator, or official associated with the USOPC; the United States Attorney General; a federal or state law enforcement authority; the Equal Opportunity Employment Commission; or Congress.

Retaliation also refers to any adverse or discriminatory action, or the threat of an adverse or discriminatory action, against any person who in good faith reports misconduct, and/or violations of the USOPC’s or NGBs’ Bylaws, policies, and procedures. Athletes who disclose information to or seek assistance from the Office of the Athlete Ombuds are also protected from retaliation as set forth in Section 220509(b)(5) of the Act.

3. Reporting Responsibility

This Whistleblower Policy is intended to encourage and enable employees and others to raise serious concerns internally so that USAPM can address and correct inappropriate conduct and actions. It is the responsibility of all board members, officers, staff and volunteers to report concerns about violations of USAPM's code of ethics or suspected violations of law or regulations that govern USAPM's operations.

The following are examples of the types of reports that would be covered under the policy, which should include, but is not limited to, reports of the following:

- a. Non-compliance with the Act;
- b. Non-compliance with the USOPC Bylaws and policies;
- c. Non-compliance with USA Pentathlon's Bylaws, policies, and procedures;
- d. Potential violations of federal, state, and local laws; and
- e. Accounting/financial fraud or malfeasance.

4. No Retaliation

It is contrary to the values of USAPM for anyone to retaliate against any other member of USAPM, who in good faith reports an ethics violation, or a suspected violation of law, such as a complaint of discrimination, or suspected fraud, or suspected violation of any regulation governing the operations of USAPM. In so far as possible, the confidentiality of the whistleblower will be maintained. However, identity may have to be disclosed to conduct a thorough investigation, to comply with the law and to provide accused individuals their legal right of defense. USAPM will not retaliate against a whistleblower and other protected individuals (i.e. witnesses, victims, etc.). Retaliation 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 or a parent or legal guardian of the protected individual relating to the allegation of physical abuse, sexual harassment or emotional abuse, with – the Center; a coach, trainer, manager, administrator, or official associated with USAPM; the Attorney General; a Federal or State law enforcement authority; the Equal Employment Opportunity Commission; or Congress. Any whistleblower who believes he or she is being retaliated against must contact the compliance officer immediately. The right of the whistleblower for protection against retaliation does not include immunity for any personal wrongdoing that is alleged and investigated.

No employee, contractor, agent, volunteer, or NGB 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 Section 220509(b)(5) of the US Olympic and Amateur Sports Act (the Act).

5. Reporting Procedure

USAPM maintains an open-door policy and suggests that affiliated members share their

questions, concerns, suggestions or complaints with a supervisor or executive. However, all written reported complaints need to go directly to a Board or Committee member with the responsibility to investigate the reported complaint. It is expected that all affiliated individuals of USAPM have an obligation to report potential or actual violations of any applicable law, rule, regulation or adopted policy of USAPM, accounting or financial fraud, or other misfeasance. Violations of local, state, and federal law *must* be reported both to USAPM and to the applicable law enforcement agency. Concerns about athlete safety must be reported in compliance with the U.S. Center for SafeSport's requirements.

If you are not comfortable speaking with a supervisor or you are not satisfied with a response, you are encouraged to speak with the CEO or Chairman. Supervisors and managers are required to report complaints or concerns about suspected ethical and legal violations in writing to the CEO or the Chairman or Board or Committee member who have the responsibility to investigate all reported complaints. Management and or staff concerns or complaints must submit their concerns in writing directly to a member of the USAPM Board of Directors or a member of the USAPM Audit and Ethics Committee.

6. Enforcement

Investigation of Potential Violations. USAPM takes its obligation to investigate potential violations seriously. All complaints regarding the violations will be investigated in accordance with the process outlined in this document below under, "Handling of Reported Violations."

7. Acting in Good Faith

Anyone filing a written complaint concerning a violation or suspected violation must be acting in good faith and have reasonable grounds for believing the information disclosed indicates a violation. 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.

8. Confidentiality

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

9. Handling of Reported Violations

USAPM's compliance officer or the CEO will notify the person who submitted a complaint and acknowledge receipt of the reported violation or suspected violation. All reports will be promptly investigated by a disinterested USAPM compliance officer, CEO or their designee with any adverse findings referred to the Audit and Ethics committee who shall empower a board of review consisting of three disinterested parties, one of whom shall be an athlete when required, selected by the CEO and/or compliance officer with appropriate corrective action taken as warranted. The board of review will make the determination on alleged violations. If the board of review finds a USAPM staff member has retaliated against a Protected Individual, that person

will be immediately terminated or suspended without pay as required by the US Olympic and Amateur Sports Act.

10. Violations Covered

Violations covered under this policy shall include but are not limited to compliance with the US Amateur Sports Act, USOPC bylaws and policies, USAPM bylaws and policies and state and federal laws. USAPM's CEO is responsible for this policy and its enforcement and receiving all reports of retaliation. All questions, reports and complaints can be made to:

USAPM CEO – Kevin Montford; kmontford@usapentathlon.org.
athletesafety@usapentathlon.org.

Athlete safety violations must be reported, but nothing in this, or any other USAPM policy, replaces or changes an individual's obligations under the SafeSport Code.

[Reports to SafeSport can be made here.](#)