



Whistleblower and Anti-Retaliation Policy

USA Boxing's policies require observation of high standards of business and personal ethics in the conduct, duties and responsibilities of athletes, members of the Board of Directors, officers, employees, contractors, members (which includes but is not limited to committee members, task force members, volunteers, and hearing panel members). This Whistleblower and Anti-Retaliation Policy binds all listed individuals to promote the enforcement of the Policy and report any alleged violations of any applicable law, rule, regulation or a USA Boxing policies, or any misconduct concerning accounting or financial fraud or other misfeasance.

Any good faith reporter and other persons (victims, witnesses, and participants in any investigation, enforcement action, or adjudication) are protected by this policy. At the same time, no one must knowingly report a false claim or submit a claim in bad faith or for any primary purpose other than enforcement of the policy at issue.

Reporting Responsibility: It is encouraged and the right and obligation of all individuals described above to comply with all USA Boxing Codes of Conduct and to report violations or suspected violations. Alleged violations include but are not limited to athlete safety violations and failures to comply with United States Olympic and Paralympic (USOPC) and USA Boxing Bylaws and Codes of Conduct; USA Boxing's policies and procedures including accounting and financial practices; the Ted Stevens Olympic and Amateur Sports Act; and federal and state laws. Submission of a knowingly filing a false claim, or a claim in bad faith or a claim for any primary purpose other than enforcement of the policy at issue is itself a violation of this Policy and may be reported as such.

Nothing in this Policy replaces or changes an individual's obligations under the SafeSport Code, and a report to USA Boxing of an athlete safety violation does not constitute notice to the United States Center for SafeSport.

No Retaliation: No individual who in good faith reports a violation of the Policy or who is protected by the policies listed (including individuals who participate in investigations) 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 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 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 authority; (E) the Equal Employment Opportunity Commission; or (F) Congress.

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 individual nor USA Boxing 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). For purposes of this Policy, a report is made in good faith when the individual making the report has an honest belief that the misconduct being reported has occurred and is a violation (or may be a violation) of the applicable rules. A person who makes a report that is not in good faith, including a report that is knowingly false, violates this policy and may be subject to sanctions hereunder.

Reporting Violations:

In addition, USA Boxing has an open-door policy and encourages that all listed above share their questions, concerns, suggestions or complaints, even about management staff, board members and committee members with someone who can address them properly. In most cases, the membership director, who can be reached at lsmith@usaboxing.org or an employee's supervisor is in the best position to address an area of concern. However, if you are not comfortable speaking with them or you are not satisfied with their response, you are encouraged to speak with the Executive Director (ED) at mmcatee@usaboxing.org or anyone in management whom you are comfortable in approaching. Supervisors and managers are required to report suspected violations of the Code of Ethics of the ED, who has specific and exclusive responsibility to investigate all reported violations. For suspected fraud, claims concerning the ED, or when you are not satisfied or uncomfortable with following USA Boxing's open-door policy, individuals should contact the Board Chairperson directly at BoardChair@usaboxing.org. It should be noted that legal counsel is also notified of any reports. Reporting through the Whistleblower and Anti-Retaliation Policy does not replace or change an individual's obligation to report athlete safety violations to Safesport. Although announcements may be made through social media and the website, official correspondence for USA Boxing must be made via email or telephone call. Text messages, instant messaging etc. will not be considered an official notification or documentation.

- **Reporting:** USA Boxing and the USPOC recognize it can be difficult to report an allegation of misconduct and strives to remove as many barriers to reporting as possible. Both provide opportunities for anonymous reports to be made; however, anonymous reporting may make it difficult for investigation, follow-up or properly address allegations.

To report a complaint, please complete the Whistleblower Form located at:

<https://forms.office.com/r/5aY4Fmc7rq>

Upon receipt of a Whistleblower Report, the report will be circulated to the USA Boxing Executive Director [mmcatee@USABoxing.org] and the Chair of USA Boxing's Board of Directors, [BoardChair@usaboxing.org]. If the Complaint is against the Executive Director, it will be submitted to the Membership Director of USA Boxing [lsmith@usaboxing.org] rather than the Executive Director, as well as to the Chair of the USA Boxing Board of Directors.

Investigation of Violations: The investigation of violations will be conducted by disinterested parties. Typically, the organization's ED is responsible for investigating and resolving all reported complaints and allegations concerning violations of the Code of Ethics, including athlete involvement and may pass reports on to the Ethics and/or the Audit Committee when

appropriate. The ED 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. Per the USA Boxing Employee Handbook, the ED will determine the consequences of the violation for employees included but not limited to termination or suspension without pay. Violations involving USA Boxing members will be resolved through USA Boxing's judicial and grievance process. If the violation involves the ED, then the Board Chairperson will investigate and report to the Ethics and/or Audit Committee. Potential reasons for the dismissal of the complaint without a full investigation may occur in instances such as: the reporting party declined to participate or insufficient evidence.

Violations of this Policy may lead to sanctions including, but not limited to a warning, private or public censure, probation, suspension, or termination.

If USA Boxing finds that an employee has retaliated against a protected individual, that person will immediately be terminated or suspended without pay as required by §220509(c)(2) of the Ted Stevens Act.

Accounting and Auditing Matters: The Audit Committee of the board of directors addresses all reported concerns or complaints regarding corporate accounting practices, internal controls, or auditing. The ED shall immediately notify the Audit Committee of any such complaint and work with the Committee until the matter is resolved.

Confidentiality: USA Boxing strives for confidentiality and will maintain confidentiality except to the extent required by USA Boxing's legal reporting requirements.

Responsibility and Resources: The persons responsible for this policy and its enforcement are the Executive Director, Mike McAtee [mmcAtee@usaboxing.org] and the Membership Director, Lynette Smith [lsmith@usaboxing.org].

In addition to USA Boxing's Whistleblower and Anti-Retaliation Policy, all individuals may find additional resources through the USOPC Athlete Ombuds Office at 719-866-5000, <https://bit.ly/OmbudsPolicy> or through the USOPC Integrity Portal at <https://usopc.navexone.com/>.