



## WHISTLEBLOWER & ANTI-RETALIATION POLICY Updated July 2025

### 1. Purpose

This Whistleblower & Anti-Retaliation Policy (the “**Policy**”) is intended to support a strong culture of integrity and ethical conduct at USA Triathlon by encouraging, valuing, and protecting good faith reporting. This Policy applies to athletes, board of directors, officers, employees, members, committee members, task force members, hearing panel members, contractors, and volunteers of USA Triathlon (also known as “**USAT**”) (collectively “**Affiliated Individuals**”) of any alleged violation of any applicable law or policy or any potential ethics issue. This Policy also applies to any good faith reporter or other reasonable parties (i.e., witnesses, victims, etc.), and such parties are also protected under this Policy.

The freedom to speak up means being able to raise concerns in whatever way is most comfortable and effective and feeling free to cooperate in investigations that follow. It also means that USA Triathlon has zero tolerance for retaliation of any kind against people who speak up in good faith. A “Whistleblower” as defined by this Policy, is any Affiliated Person who reports an alleged violation that they consider to be addressed by this Policy.

### 2. Violations Covered by this Policy

Alleged violations covered under this Policy include, but are not limited to, the following:

- i. any applicable State and/or Federal laws, rules and regulations;
- ii. the bylaws, rules & regulations, policies & procedures of the United States Olympic and Paralympic Committee (“**USOPC**”);
- iii. the bylaws, rules & regulations, policies & procedures of USA Triathlon;
- iv. the U.S. Center for SafeSport Code (the “**SafeSport Code**”);
- v. USA Triathlon’s applicable codes of conduct;
- vi. accounting or financial practices (e.g., financial fraud or malfeasance); or
- vii. the Ted Stevens Olympic and Amateur Sports Act (the “**Act**”).

If an Affiliated Individual is unsure about whether a matter might be a policy violation or is unsure about their reporting responsibility for a particular type of matter, provided that they acting in good faith, they should submit a report.

There are some violations that *must* be reported. Affiliated Individuals should be familiar with their reporting obligations under the [USA Triathlon Safe Sport Policy](#), [SafeSport Code](#) and applicable

federal or state law. If an Affiliated Individual suspects any criminal activity against a person or property, they should report this directly to law enforcement immediately.

**Nothing in this Policy changes or replaces any mandatory reporting obligations under the SafeSport Code for the Olympic and Paralympic Movements – contact the USAT Legal Team at [legal@usatriathlon.org](mailto:legal@usatriathlon.org) if you have any questions about those obligations.**

### **3. Reporting**

#### How to Report

An Affiliated Individual can make a report by emailing [legal@usatriathlon.org](mailto:legal@usatriathlon.org) which will be directed to the USA Triathlon General Counsel and Ethics Committee for review. Reports should be factual and contain as much specific information as possible, especially if the report is submitted anonymously.

As a reporter, Affiliated Individuals should not investigate the matter of concern nor determine fault or resolutions. The Affiliated Individual's role is to raise the issue so that the right people can take action. Investigations of reports are discussed below.

#### Acting in Good Faith

Just as Affiliated Individuals need to make sure that no one in their community is fearful of speaking up, they also need to ensure that no one in their community is fearful about false reports that might harm them. To that end, anyone reporting a perceived ethical, policy, financial, or legal violation must be acting in good faith and have some basis for believing that there may be a violation. Anyone knowingly making a false report (or making such a report with no basis for its validity) is violating this Policy and the USA Triathlon Code of Conduct in the same way as someone retaliating against someone making a goodfaith report. Such a violation may itself be reported under this Policy and it may lead to serious consequences, including termination of employment or participation.

### **4. Investigation**

Provided a conflict of interest does not exist, USA Triathlon's Ethics Committee and/or General Counsel investigate complaints of alleged violations under this Policy and make determinations on alleged violations, including any applicable athlete involvement. If there is a conflict of interest upon initial review, USA Triathlon will engage an independent third-party professional to investigate the complaint. If upon investigation, USA Triathlon finds that an employee has retaliated against a protected individual, that person will be immediately terminated or suspended without pay as required by §220509(c)(2) of the Act. In all cases, USA Triathlon is committed to ensuring that no good faith report goes unheard or ignored.

The Affiliated Individual may reach out to the USAT Legal Team to inquire about the progress of the investigation. The USAT Legal Team may provide information as appropriate. However, confidentiality and legal obligations may affect the details available.

## 5. Zero Tolerance for Retaliation

### Definition of a Protected Individual

As defined by the SafeSport Authorization Act, a “**Protected Individual**” is any amateur athlete, coach, trainer, manager, administrator, or official associated with the USOPC or a National Governing Body (“**NGB**”).

### Definition of Retaliation

USA Triathlon defines “**Retaliation**”, in accordance with §220501(b)(11) of the Act, as 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 NGB’s 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.

### Anti-Retaliation Policy

USA Triathlon has an open-door policy and encourages Affiliated Individuals to share questions, concerns, suggestions or complaints in the way and to the people with which they are most comfortable. This means Affiliated Individuals have the right to report and options for how to report any concern about a potential ethical, policy, financial or legal violation.

USA Triathlon has zero tolerance for retaliation against people who make good faith reports of potential ethical, policy, financial or legal violations, or who cooperate with investigations of those reports (e.g., cooperating witnesses or victims). That means no Affiliated Individuals may threaten, harass, discriminate against, or take any negative employment (where applicable) or participation related action (e.g., discharge, demotion, suspension, non-assignment, negative review) on that basis.

USA Triathlon also prohibits retaliation against whistleblowers and other protected individuals. 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 §220509(b)(5) of the Act.

### Reporting Retaliation

Any retaliation can be reported as described above in the same way as any other policy violation. It will be treated as a violation of this Policy and the USA Triathlon’s Code of Conduct and may lead to

serious consequences including termination of employment or participation for anyone involved in retaliation.

## **6. Confidentiality**

Good faith reports may be submitted on a confidential basis. In many cases, a reported matter will need investigation in order to reach the right resolution. Cooperation as a reporter or otherwise may be very helpful and much appreciated. Reports will be treated as confidentially as possible; some information may have to be disclosed to certain parties in order to conduct a thorough investigation, to comply with the law, and to provide the accused individual(s) access to due process.

If a matter is reported anonymously and the reporter chooses to remain anonymous as it is investigated, USA Triathlon will respect that.

## **7. Resources**

For more information about this Policy because contact:

USA Triathlon General Counsel: [legal@usatriathlon.org](mailto:legal@usatriathlon.org)  
USA Triathlon Ethics Committee Chair: [ethics@usatriathlon.org](mailto:ethics@usatriathlon.org)

Other available resources:

USOPC Athlete Ombuds: The Athlete Ombuds Office provides cost-free, independent and confidential advice regarding Team USA athlete rights, grievance procedures and any other related guidance pertaining to selection procedures and can assist in mediating disputes between athletes and USEF.

Email: [ombudsman@usathlete.org](mailto:ombudsman@usathlete.org)  
Phone: (719) 866-5000

USOPC Integrity Unit: Through its [Speak Up Policy](#), the USOPC Ethics and Compliance team seeks to empower athletes, USOPC employees and volunteers, NGB employees and volunteers, and other individuals within the U.S. Olympic and Paralympic Movement to raise and report their concerns.

Any individual may report concerns confidentially, or anonymously, online using the USOPC Integrity Portal. If preferred, individuals may call the USOPC Integrity Hotline at 1-877-404-9935 to report their concern over the phone.

*This Policy is always available on USA Triathlon's website.*