



## **Whistleblower Policy & Anti-Retaliation Policy**

The United States Equestrian Federation (the “Federation”) requires its Board of Directors, Officers, athletes, members, volunteers (including all committee, council, working group, task force, and hearing panel members), employees, licensed officials, coaches, chefs d’equipe, contractors, and others appointed or authorized to act on behalf of the Federation (“Covered Persons”) to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. As employees and representatives of the Federation, we must practice honesty and integrity in fulfilling our responsibilities and comply with all applicable laws and regulations.

### **Reporting Responsibility**

This Whistleblower Policy is intended to strongly encourage and enable Covered Persons to raise serious concerns internally so that the Federation can address and correct inappropriate conduct and actions. It is the responsibility of all Covered Persons to report concerns about compliance with the Ted Stevens Olympic & Amateur Sports Act, United States Olympic and Paralympic Committee (“USOPC”) Bylaws and policies, Federation Bylaws, policies and procedures, State or Federal laws, and accounting and financial practices (each a “Covered Policy” and collectively “Covered Policies”).

Covered Persons are required to report alleged violations of the U.S. Center for SafeSport Code (the “Code”), USEF Safe Sport Policy, Minor Athlete Abuse and Prevention Policies (MAAPP), and the Code of Conduct. Nothing in this Policy replaces or changes an individual’s reporting obligation under the Code or USEF Safe Sport Policy.

### **Protected Individuals & Anti-Retaliation**

It is contrary to the values of the Federation for any Covered Person to retaliate against any Protected Individual who in good faith reports a violation of a Covered Policy. Protected Individuals are defined as any good faith reporter or reasonable party (i.e., witness, victim), including an amateur athlete, coach, trainer, manager, administrator, official associated with the USOPC or USEF.

Retaliation against someone for reporting in good faith a violation of a Covered Policy, or cooperating with the investigation and resolution process will not be tolerated and will be considered a violation under this Policy and grounds for discipline.

Retaliation occurs when a Covered Person (directly or indirectly) takes adverse action against a good-faith reporter or whistleblower for reporting a violation of a Covered Policy or engaging in a process regarding a reported violation of a Covered Policy. An adverse action may include an action, threat, or inaction that would seemingly punish or otherwise dissuade a reasonable person from raising a concern about a possible violation of a Covered Policy or engaging in the process regarding the same.

Pursuant to 36 U.S.C. 220524(11), retaliation also includes any adverse or discriminatory action, or the threat of an adverse or discriminatory action, including but not limited to: 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 U.S. Center for SafeSport;
- (B) a coach, trainer, manager, administrator, or official associated with the USOPC;
- (C) the Attorney General;
- (D) a Federal or State law enforcement authority;
- (E) the Equal Employment Opportunity Commission; or
- (F) Congress.

USEF employees found to have retaliated against a good faith reporter will be immediately terminated or suspended without pay pursuant to 36 U.S.C. §220509(c)(2).

Neither USEF nor any USEF employee, contractor, agent, or volunteer 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 Athlete Ombuds as outlined in 36 U.S.C. to §220509(b)(5).

## **Reporting Procedure**

### **General**

Any report can be made to the Audit Committee ([auditcommittee@usef.org](mailto:auditcommittee@usef.org)), General Counsel ([generalcounsel@usef.org](mailto:generalcounsel@usef.org)), or Regulations Department ([disputes@usef.org](mailto:disputes@usef.org)).

The Federation’s General Counsel is responsible for ensuring that all reports are investigated and factual determinations are made by the Audit Committee, or if necessary a Hearing Committee panel. At all times only disinterested persons will be involved in the investigation and resolution of a reported violation. The General Counsel will advise the Chief Executive Officer and the Audit Committee of all reported violations of this Policy, unless said complaint involves the Chief Executive Officer.

The General Counsel will report at least annually and as required to the USOPC as to complaints made and their resolution.

### **Employee**

The Federation has an open door policy and suggests that employees share their questions, concerns, suggestions, or complaints with their supervisor. If an employee is not comfortable speaking with their supervisor or they are not satisfied with their supervisor’s response, they are encouraged to speak with the Chief Human Resource Officer ([hr@usef.org](mailto:hr@usef.org)), General Counsel ([generalcounsel@usef.org](mailto:generalcounsel@usef.org)), or Audit Committee Chair ([auditcommittee@usef.org](mailto:auditcommittee@usef.org)). Supervisors and managers are required to report complaints or concerns about suspected ethical and legal violations in writing to the Federation’s General Counsel ([generalcounsel@usef.org](mailto:generalcounsel@usef.org)) or the Audit Committee Chair (see [usef.org](http://usef.org)), who has the responsibility to investigate all reported complaints. Employees with concerns or complaints may also submit their concerns in writing directly to their supervisor, the Senior Staff member who manages their department, Chief Human Resource Officer ([hr@usef.org](mailto:hr@usef.org)), General Counsel ([generalcounsel@usef.org](mailto:generalcounsel@usef.org)), or Audit Committee Chair ([auditcommittee@usef.org](mailto:auditcommittee@usef.org)).

## **Acting in Good Faith**

Anyone reporting 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 that prove to have been made maliciously or knowingly to be false will be viewed as a serious disciplinary offense and will be considered a violation of this Policy, subjecting the reporting party to disciplinary action.

## **Confidentiality**

Good faith reports may be submitted on a confidential basis by the claimant. Except when confidentiality is waived or reporting information is required by law, the identity of a good faith reporting party will be kept confidential to the extent possible, consistent with the need to conduct an investigation and resolve the matter.

## **Handling of Reported Violations**

The Federation's General Counsel will ensure notification to ~~notify~~ the person who submitted a reported violation and acknowledge receipt of the report. All reports will be promptly investigated by a disinterested person in the legal department or appointed by the legal department.

Reports concerning improprieties of Federation accounting and financial practices, or the Conflict of Interest and Gifts & Entertainment Policy will be investigated at the direction of the Audit Committee. A report will be submitted to the Board of Directors for appropriate action, which may include, among other appropriate actions, a directive to file Disciplinary Action Complaint, which would follow the procedures referred to below.

For all other substantiated reports as well as the process and potential penalties for reported allegations pursued through the Disciplinary Complaint Process, see the Federation Bylaws, Supplemental Procedures for Grievances and Complaints, and Chapter 7 of the Rulebook.

## **Resources**

For information about the Whistleblower & Anti-Retaliation Policy, including any of its provisions contact [generalcounsel@usef.org](mailto:generalcounsel@usef.org).

**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.

**Team USA Athletes:**

Athlete Ombuds Office - 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.

To contact the Athlete Ombuds Office:

PHONE: (719) 866-5000

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