



## USA Judo Whistle-Blower Policy

### Purpose

This Whistle-Blower Policy (the “Policy”) is intended to support a strong culture of integrity and ethical conduct at USA Judo by encouraging, valuing and protecting good faith reporting by athletes, directors, officers, employees, contractors, members, committee members, task force members, hearing panel members and volunteers (“Affiliated Individuals”) of USA Judo of any alleged violation of any applicable law or policy or any potential ethics issue.

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 Judo has zero tolerance for retaliation of any kind against people who speak up in good faith.

### Violations Covered by this Policy

This Policy is for use where there may be a violation of:

- The Ted Stevens Amateur Sports Act
- The US Olympic and Paralympic Committee Bylaws
- any applicable law, rule or regulation
- any USA Judo policy
- principles of ethics
- accounting or financial practices (e.g. fraud)

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, please start by reviewing the particular policy involved. USA Judo staff should refer to the USA Judo Employee Handbook, Financial Policies and Procedures Manual, Code of Ethics and USA Judo SafeSport Handbook for more information.

Keep in mind that some violations **must** be reported. Specifically, please be familiar with the requirements in the Athlete Safety Policy and USA Judo SafeSport Handbook. 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 – talk to USA Judo’s CEO if you have any questions about those obligations.**

## **Reporting**

### No Retaliation

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

USA Judo has zero tolerance for retaliation against people who in good faith reports potential ethical, policy, financial or legal violations, or who cooperates with investigations of those reports. That means no Affiliated Individual 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.

Any such retaliation can be reported as described below in the same way as any other policy violation. It will be treated as a violation of this Policy and USA Judo’s Code of Conduct and may lead to serious consequences including termination of employment or participation for anyone involved in retaliation.

### How to Report

Affiliated Individuals may always report to a USA Judo staff member or their supervisor (if applicable). Or, the Affiliated Individual can make a report to the Chief Executive Officer, Director of Finance, Compliance & Office Operations or President. These are people who can also discuss the concern and help make sure it is addressed. Affiliated Individuals can also make reports to the Chair of the Ethics & Grievance Committee or any USA Judo Board Member.

Please remember that as a reporter, Affiliated Individuals do not and should not investigate the matter of concern or determine fault or how to fix it. The Affiliated Individual does his or her part by making it known so the right people can take action. Investigations of reports are discussed below.

### Acting in Good Faith

Just as we need to make sure that no one in our community is fearful of speaking up, we also need to make sure that no one in our community is fearful about false reports that might harm them.

With that in mind, anyone reporting a perceived ethical, policy, financial or legal violation must be acting in good faith and have some basis for believing there may be a violation. Anyone that makes a false report knowing that it is false or that it has no basis is violating this Policy and the USA Judo Code of Conduct in the same way as someone retaliating against a good faith reporter. Such a violation may itself be reported under this

Policy and it may lead to serious consequences, including termination of employment or participation.

## **Investigation**

Once a report is made in one of the ways described above, the person receiving the report is responsible for getting it to the person who can best address the concern, based on the matter reported and in keeping with other appropriate policies. In all cases, USA Judo is committed to ensuring that no good faith report goes unheard or ignored.

USA Judo's Compliance Officer shall be the Chair of the Ethics & Grievance Committee and is responsible for coordinating among these people so that reporters can be confident that reported concerns get to the people best positioned to act on them. Investigations and determinations will be executed by disinterested parties and include athlete representation where required. The Compliance Officer will advise the Chief Executive Officer and/or the Board of Directors of all complaints and their resolution and will report regularly to the USA Judo Ethics & Grievance Committee.

USA Judo's Compliance Officer shall immediately notify the Audit Committee of any concerns or complaints regarding corporate accounting practices, internal controls or auditing and work with the committee until the matter is resolved.

## **Confidentiality**

In many cases, a reported matter will need investigation to reach the right resolution. Cooperation as a reporter or otherwise may be very helpful and much appreciated. Insofar as possible, the confidentiality of the reporter will be maintained. However, 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 accused individuals access to due process.

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

## **Follow Up**

If an Affiliated Individual reports an alleged violation of ethics, USA Judo policy or applicable laws, USA Judo will report back to the Affiliated Individual on the progress and investigation results as appropriate. And of course, the Affiliated Individual is always free to follow up to learn more from the person they reported to. Confidentiality and legal obligations may affect the details available.

If the investigation of a report that was made in good faith is not to the satisfaction of the reporter, then the reporter may report that too.

Thank you for helping to ensure that USA Judo is a safe zone for speaking up in good faith on important matters.

Policy approved by the Board of Directors on February 24, 2022.