WHISTLEBLOWER AND ANTI-RETALIATION POLICY

Policy Owner: **General Counsel**
Effective Date: **November 5, 2026**

Section 1: Definitions

Good Faith Reporter. An individual who acts with honesty and good intent when reporting an alleged Violation of this Policy.

ID Holder. Any athlete, coach, or official who maintains a USA Football ID in good standing.

Protected Individual. Defined in Section 3 (Application) of this Policy.

Whistleblower. A Protected Individual, Good Faith Reporter, or other reasonable party (i.e. witnesses, victims, etc.) who reports an alleged Violation as defined in Section 4 of this Policy. All Whistleblowers acting in good faith are protected under this Policy.

Section 2: Introduction

The Whistleblower and Anti-Retaliation Policy (the "Policy") is intended to support a strong culture of integrity and ethical conduct within the USA Football (USAFB) community by encouraging, valuing, and protecting good faith reporting of any alleged violation of any applicable law, policy, or any potential ethics issue.

USAFB has zero tolerance for retaliation of any kind against people who raise concerns in good faith and/or cooperate in a sanctioned investigation. All Protected Individuals are protected under this Policy.

Section 3: Application

This Policy, as well as the protection it provides, applies to the following individuals ("Protected Individuals"):

a) Team USA Football ID Holders

- Coach
- Official
- Athlete

b) Employees

c) Board of Directors

d) Officers

e) Committee & Council Members

f) Volunteers (as designated as subject to this policy by USAFB) with Board of Directors delegated powers or substantial decision-making authority

g) Hearing Panel Members

h) Any good faith reporter

i) Contractors, who shall be required, where reasonable, to comply with this Policy through the terms of their written contracts with USAFB

j) Any other reasonable parties (i.e., witnesses, victims)

Section 4: Violations

Alleged Violations covered under this policy includes, but is not limited to, the following:

a) Compliance with the Ted Stevens Olympic and Amateur Sports Act (the "Act");

b) Compliance with United States Olympic and Paralympic Committee ("USOPC") Bylaws, Policies and Procedures;

c) Compliance with USAFB's Bylaws, Policies and Procedures;

d) Compliance with the U.S. Center for SafeSport Policies and Procedures (i.e. Code of Conduct Policy);

e) Compliance with USADA Policies and Procedures;

f) Compliance with the USAFB Code of Conduct;

g) Compliance with Federal, State and Local Laws; and

h) Accordance with all applicable accounting and financial practices.

If a Protected 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 applicable policy. USAFB staff should also refer to the Employee Handbook for more information.

Please keep in mind that some violations must be reported due to the mandatory reporting requirements for USAFB Participants consistent with the USAFB Response and Resolution Policy and the U.S. Center for SafeSport's SafeSport Code ("SafeSport Code") for the Olympic and Paralympic Movement and nothing in this Policy changes or replaces a Participant's mandatory reporting obligations under the SafeSport Code. If you have any questions about these obligations, contact the General Counsel (compliance@usafootball.com).

In addition, if a Protected Individual suspects any criminal activity against a person or property, please report this immediately and directly to law enforcement.

Section 5: Retaliation

Retaliation, for the purposes of this Policy, is defined as any adverse or discriminatory action, or the threat of an adverse or discriminatory action, carried out against a Protected Individual as a result of any communication, including but not limited to, 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 emotional, physical or sexual misconduct or any other alleged Violation covered under this Policy to USAFB, the USOPC, the Office of the Athlete Ombuds, any law enforcement agency or government entity, or employees of these organizations. This definition is consistent with, but not limited to, the definition of retaliation set forth in Section 220501(b)(11) of the Act.

Examples of adverse or discriminatory actions that would be considered retaliatory include, but are not limited to:

a) Removal from a training facility

b) Reduced coaching or training

c) Reduced meals or housing

d) Removal from competition

In addition, no Protected Individual nor USAFB 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. This protection is consistent with Section 220509(b)(5) of the Act.

Lastly, no Protected Individual nor the USAFB may retaliate against an employee or contractor with the intent or effect of adversely affecting the terms or conditions of employment or other contractual rights (including, but not limited to, threats of physical harm, loss of job, punitive work assignments, impact on salary or wages, or impact on contractual payments).

Section 6: No Retaliation

USAFB has zero tolerance for Retaliation against a Whistleblower or any Protected Individual who makes good faith reports or cooperates with investigations of alleged Violations. The USAFB community has the right to report alleged Violations and USAFB encourages the reporting of such allegations. USAFB has an open-door policy and encourages Protected Individuals to share questions, concerns, and/or suggestions.

Section 7: Reporting an Alleged or Suspected Violation

The USAFB community has the right, and obligation, to report alleged Violations and USAFB encourages the reporting of such allegations.

a) **Process to Report.** Suspected violations shall be considered an Administrative Grievance and reported via the Notice of Grievance Form to both the General Counsel, (compliance@usafootball.com) and Judicial Committee (judicial@usafootball.com) consistent with the USAFB Grievance Policy. Should the allegation be against the General Counsel, the Notice of Grievance Form should be submitted directly to the USAFB Chief Operating Officer (chief@usafootball.com).

b) **Whistleblower Protection.** Whistleblowers who believe they have been retaliated against may file a written complaint with the Chair of the Judicial Committee at legal@usafootball.com.

c) **Remedy.** A proven complaint of retaliation shall result in a proper remedy for the individual harmed and the initiation of disciplinary action against the retaliating individual, up to and including dismissal or removal from USAFB participation or affiliation. This protection from retaliation is not intended to prohibit the Board of Directors, CEO, or managers/supervisors from taking action, including disciplinary action, in the usual scope of their duties and based on valid performance-related factors.

d) **Applicable Policy Exception.** The Chair of the Judicial Committee may redirect a report if, based on the matter reported, it is more appropriate to be addressed under a more applicable policy.

Section 8: Confidentiality

Cooperation of the Good Faith Reporter and/or the Whistleblower can be helpful to reach the right resolution. However, if the individual does not agree to be identified, reports will be treated as confidential as possible. Be advised that some information may be required to be disclosed by law, statute, or policy (i.e., identification is necessary for law enforcement, USAFB, or other oversight body representatives to investigate or respond effectively to a report, identification is required by law, or the individual accused of policy violations is entitled to the information as a matter of legal right in disciplinary proceedings). As USAFB has an obligation to investigate alleged Violations, please remember there is no such thing as an “unofficial” or “off the record” report.

Section 9: 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 of false allegations. As such, individuals reporting a perceived Violation must have some reasonable basis for believing there may be a Violation. Knowingly making a false allegation is a Violation of this Policy.

Section 10: Enforcement

a) **Investigation.** The Judicial Committee shall have the responsibility to investigate alleged Violations of this Policy. Once a report is received, allegations will be investigated in accordance with the USAFB Grievance Policy. In all cases, matters will be investigated by a disinterested party.

i. **Summary Dismissal.** The Judicial Committee may decide to dismiss the complaint on such grounds it deems appropriate, including but not limited to, there is insufficient evidence tosubstantiate the complaint, the complaint fails to identify an offending party, and/or the reporting party investigation process. declines to participate in the

ii. **Employment Suspension/Termination.** As required by 36 U.S.C. § 220509(c)(2) of the Act, if it is found that a USAFB Employee has retaliated against a Protected

Individual, the employee will be immediately terminated or suspended without pay.

b) **Disinterested Parties.** Enforcement will be executed by individuals who are unbiased, impartial, and free from prejudice and conflict of interests.

Please remember as a reporter, Protected Individuals do not need to (and should not) investigate the matter of concern or determine fault or resolution. The Protected Individual does his or her part by making the concern known so the right people can take action.

Section 11: USAFB Points of Contact

Affiliated persons in need of further information, guidance and/or enforcement in relation to this Policy may contact the following: Judicial Committee (judicial@usafootball.com) and General Counsel (legal@usafootball.com)

The USOPC Ethics & Compliance team can serve as a secondary resource for questions or concerns regarding this Policy. The USOPC Ethics & Compliance team may be contacted at:

Integrity Hotline: 877.404.9935

Integrity Portal: https://usopc.ethicspoint.com

For Athletes with Questions Regarding this Policy:

The Athlete Ombuds provides cost-free, independent, and confidential advice regarding athlete rights; resolving disputes or grievances; and any sport rules, policy, or process, including NGB-athlete agreement, codes of conduct or team selection procedures. The Athlete Ombuds can also help athletes connect with legal counsel or mental health resources if needed. Athletes may contact the Athlete Ombuds at:

PHONE: (719) 866-5000

EMAIL: ombudsman@usathlete.org

WEBSITE: www.usathlete.org