



UNITED STATES SAILING FOUNDATION
A DELAWARE NONPROFIT CORPORATION

USSF Whistleblower Protection Policy

This policy is intended to facilitate the reporting of violations or suspected violations of applicable laws or regulations or of any of USSF's policies. It is the responsibility of all volunteers and employees to report any such violations or suspected violations in accordance with this Whistleblower Policy.

Any volunteer or employee who reports waste, fraud, abuse, misconduct, or other violations of USSF policies will not be terminated or otherwise retaliated against for making the report. The report will be investigated and even if it is determined that no violation occurred, the individual making the report shall not be retaliated against. There shall be no punishment for reporting concerns of misconduct under this Whistleblower Policy, including termination of employment, demotion, suspension, harassment, failure to consider an employee for promotion, or any other kind of discrimination.

REPORTING

It is the responsibility of all USSA and USSF board members, officers, employees, and volunteers (hereinafter "Covered Persons") to report concerns about the following: questionable accounting, internal accounting controls or auditing matters; questionable insurance claims practices; violations of local, state or federal laws or regulations; violations of USSF's Code of Ethics and Conflict of Interest policy and all other USSF policies..

Covered Persons are strongly encouraged to raise their concerns about violations or suspected violations by submitting them in the form of a complaint to the USSA CEO, CFO or Compliance Manager. However, if for any reason a Covered Person is not comfortable speaking to the CEO, CFO or Compliance Manager, or does not believe the issue is being properly addressed, he or she may contact the President of the USSA or USSF Board of Directors. All complaints should be in writing and should include a full statement of the acts or omissions, along with relevant dates, forming the basis of the complaint. In addition, the complaint should state that it is being made pursuant to this Whistleblower Policy.

To facilitate the investigation of the complaint, the complaint should include contact information for the person making the complaint. Reports of concerns and investigations pertaining thereto shall be kept confidential to the extent possible. However, consistent with the need to conduct an adequate investigation, complete confidentiality cannot be guaranteed. A person submitting a complaint on a confidential, anonymous basis is not required to include contact information, but should be aware that the nature of the concerns may lead to the identification of that person as the source of the complaint.

REPORT INVESTIGATION

USSF will assess every complaint submitted under this Whistleblower Policy and determine the appropriate next steps, including investigation and resulting corrective and/or disciplinary actions, if appropriate. Matters reported internally will be assessed by the USSA CEO to determine if the



allegations are true, whether the issue is material and what actions, if any, are necessary to correct the problem. The USSA CEO shall issue a full report of all matters raised under this policy to the USSF Board President. The President may order a further investigation upon receiving the report from the CEO.

For matters reported directly to the Board President, the President will assess every complaint submitted under this Whistleblower Policy and determine the appropriate next steps, including investigation and resulting corrective and/or disciplinary actions, if appropriate.

The President may enlist employees or volunteers of USSF, USSA and/or outside legal, accounting, private investigators, or any other resource, as appropriate, to conduct any investigation of complaints submitted pursuant to this Whistleblower Policy.

RETALIATION & DISCRIMINATION

The Whistleblower Policy is intended to encourage all Covered Persons to raise serious concerns within the organization for investigation and appropriate action.

No Covered Person shall suffer harassment, intimidation, adverse employment or livelihood consequences, or any other form of retaliation for (i) making a good faith report of a violation or retaliation or (ii) participating in an investigation or inquiry by USSF, USSA, or any court, law enforcement, or other governmental or administrative body.

An individual who retaliates against any person who has reported a concern under this Whistleblower Policy in good faith is subject to discipline up to and including termination of employment. Covered Persons filing a report under this Whistleblower Policy must at all times be acting in good faith. Good faith means that the Covered Person has reasonable grounds for believing the matter raised is a violation. Reports not made in good faith will be viewed as a serious disciplinary offense and may result in discipline. Depending on the circumstances, such conduct may give rise to other actions, including civil or criminal lawsuits.

Policy approved 11/13/2019