



## WHISTLEBLOWER & ANTI-RETALIATION POLICY

The American Road Horse & Pony Association, Inc. (“ARHPA”) requires the Board of Directors, Officers, volunteers (including all committee, council, and task force members), employees, licensed officials, coaches, and others appointed or authorized to act on behalf of ARHPA 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 encourage and enable employees and others to raise serious concerns internally so that ARHPA can address and correct inappropriate conduct and actions. It is the responsibility of all board members, officers, volunteers, contractors providing substantial services to ARHPA, and employees to report concerns about violations of the Ted Stevens Olympic & Amateur Sports Act, USOPC Bylaws, ARHPA’s Code of Ethics, ARHPA’s Conflict of Interest Policy, or suspected violations of State or Federal laws that govern ARHPA’s operations.

### Anti-Retaliation

It is contrary to the values of ARHPA for any Board member, officer, committee member (including council, hearing panel, task force, Ad Hoc, and working group member), employee, athlete, or member to retaliate against any whistleblower who in good faith reports a violation of the Ted Stevens Olympic & Amateur Sports Act, USOPC Bylaws, ARHPA’s Code of Ethics, ARHPA’s Conflict of Interest Policy, or State or Federal laws that govern ARHPA’s operations, i.e., a complaint of discrimination, or suspected fraud, or Conflict of Interest Policy violation.

Retaliation against someone reporting a violation in good faith will not be tolerated and will be considered a violation under this Policy and grounds for discipline up to and including dismissal from the volunteer position or termination of their employment.

Retaliation includes any actions that threaten, harass, discriminate against, or take any negative employment or related action (e.g., discharge, demotion, suspension, negative review) for filing a whistleblower report.

### Reporting Procedure

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 the Chief Human Resource Officer ([hr@usef.org](mailto:hr@usef.org)).

The Federation has an Open Door policy and suggests that employees share their questions, concerns, suggestions, or complaints with their supervisor. If you are not comfortable speaking with your supervisor or you are not satisfied with your supervisor’s response, you 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)).

The Federation's General Counsel is responsible for ensuring that all complaints are investigated and factual determinations are made by the Audit Committee, or if necessary a Hearing Committee panel to ensure the matter is evaluated by disinterested persons. The General Counsel will advise the Chief Executive Officer and the Audit Committee of all complaints, unless said complaint involves the Chief Executive Officer, and ultimately their resolution is determined by the Board of Directors. The General Counsel will report at least annually to the United States Olympic & Paralympic Committee as to complaints made and their resolution.

### **Acting in Good Faith**

Anyone filing a complaint concerning 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. Such offense may result in discipline, up to and including dismissal from the volunteer position or termination of employment.

### **Confidentiality**

Violations or suspected violations may be submitted on a confidential basis by the claimant. Reports of violations or suspected violations will be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation and resolve the matter.

### **Handling of Reported Violations**

The Federation's General Counsel will notify the person who submitted a complaint and acknowledge receipt of the reported violation or suspected violation. All reports will be promptly investigated and appropriate corrective action will be taken if warranted by the investigation.

General Counsel:  
[generalcounsel@usef.org](mailto:generalcounsel@usef.org)  
(859) 225-2045