

## **USA Climbing Whistleblower and Anti-Retaliation Policy**

### Overview

The USA Climbing Whistleblower and Anti-Retaliation Policy applies to all athletes, employees, Board of Directors members, Officers, committee members, task force members, hearing panel members, volunteers, and contractors (referred to as “Covered Individuals” hereafter). This policy protects all individuals who, in good faith, report a violation of USA Climbing policies from retaliation. “Retaliation” is defined by USA Climbing as any form of harassment, adverse employment consequence, or punishment that emerges as a result of reporting a violation or suspected violation of USA Climbing Bylaws (including the Code of Ethics), Code of Conduct, the Ted Stevens Act, state and federal laws, and applicable policies and procedures that govern the operations of USA Climbing (including accounting practices).

### Organizational Expectations

No Covered Individual who, in good faith, reports a violation as articulated above shall be subject to retaliation. The right to report alleged violations must be non-discriminatory. The protections specified in this policy are in place to encourage Covered Individuals to report violations, in good faith, once suspected or observed. The identity of the whistleblower shall be kept confidential from those who do not have a “need to know” to further reduce the possibility of retaliation.

### Reporting Violations and Retaliation

Any violation or suspected violation of USA Climbing Bylaws (including the Code of Ethics), Code of Conduct, the Ted Stevens Act, state and federal laws, and applicable policies and procedures that govern the operations of USA Climbing (including accounting practices) should be reported to the CEO, Board of Directors, or Judicial Committee. Likewise, if retaliation is experienced or witnessed, retaliation should also be reported to the CEO, Board of Directors, or Judicial Committee. The act of retaliation shall be considered a Code of Conduct violation and will be subject to review per the processes articulated in Article 15 of the Bylaws.