



USAA Code of Conduct Policies

SafeSport Code

POLICY STATEMENT

USAA is committed to maintaining cooperative work, training and sports environments in which there exists mutual respect for all athletes, coaches, judges and other officials, and for all USAA directors, officers, employees and volunteers. USAA is committed to creating a safe and positive environment for its athletes and participants involved in sport, free of misconduct.

As a member organization of the U.S. Olympic Committee, USAA and its members are required to comply with the U.S. Center for SafeSport Code for the U.S. Olympic and Paralympic Movement, the appended Practices and Procedures (Appendix A to the Code), and the Supplemental Rules for SafeSport Arbitrations (Appendix B to the Code) (collectively, the “Code”), including reporting requirements. Except as specifically noted in the Code, the Code applies without respect to age or competitive level. The Code serves as the benchmark by which the U.S. Center for SafeSport or USAA determines whether a SafeSport Code Violation has occurred. For those violations that fall within the jurisdiction of the U.S. Center for Safe Sport the Center will determine resolutions and sanctioning for the violation. Any SafeSport Code Violation that occurs outside the jurisdiction of the U.S. Center for SafeSport will be processed through USAA’s internal Complaint procedures as outlined in the USAA bylaws.

The Code outlines prohibited conduct related to:

- Bullying Behavior
- Emotional Misconduct
- Harassment
- Hazing
- Physical Misconduct
- Sexual Misconduct

The definitions of prohibited conduct and other defined terms contained in the Code, as amended from time-to-time, are incorporated herein by this reference. The Code in its full

form along with reporting guidelines can be found at the U.S. Center for SafeSport website at www.safesport.org.

In addition to engaging in prohibited conduct under the Code, engaging in misconduct which is contrary to USAA policy of equal employment and sports opportunity without regard to age, sex, sexual orientation, citizenship, religion, race, disability or national or ethnic origin, will not be tolerated within the USAA.

Other USAA policies, procedures and codes, including, but not limited to, the USAA Code of Conduct and Code of Ethics, may deal with other forms of conduct that are prohibited and that are subject to action by USAA for violation of such policies, procedures and codes.

SCREENING

Any employee, volunteer, instructor, coach, judge, administrator or member who has routine access to minors within a USAA Event or club activity must clear a USAA approved background screening and successfully complete the U.S. Center for SafeSport's training at a minimum of every two years (beginning in 2018). This information must be verified by USAA within USAA's membership records. Any person serving in such capacity at a USAA Event or club activity who has, or is expected or planned to have, interactions with minors in the course of their duties is considered to have routine access. USAA will not authorize or sanction in any USAA Event or program any person who has routine access to minors who refuses to be screened by USAA or to take the U.S. Center for SafeSport's training before being allowed to have such routine access to minors. The responsibility of monitoring the Code lies with the organizer, Club or State Association of the USAA sanctioned event or activity. A person may be disqualified and prohibited from serving as an employee, director, volunteer, coach, judge, trainer or manager of minors if the person has:

- Been convicted (including crimes the record of which has been expunged and pleas of "no contest") of a crime of child abuse, sexual abuse of a minor or adult, physical abuse, causing a child's death, neglect of a child, murder, manslaughter, felony assault, any assault against a minor, kidnapping, arson, criminal sexual conduct, prostitution related crimes or controlled substance crimes.
- Being adjudged liable for civil penalties or damages involving sexual or physical abuse of minors or adults.
- Being subject to any court order involving any sexual abuse or physical abuse of a minor or adult, including but not limited to domestic order or protection.
- Had their parental rights terminated.
- A history with another organization (volunteer, employment, etc.) of complaints of child sexual abuse or other sexual misconduct, or physical abuse of minors or adults.
- Resigned, or been terminated or been asked to resign from a position, whether paid or unpaid, due to complaint(s) of sexual or physical abuse
- Has a history of other behavior that indicates they may be a danger to children in USAA or participating in USAA Events or programs.
- Has been declared a sex offender in any applicable federal or state jurisdiction.

- Is listed on any federal or state sexual offender list or registry.

WILLFULLY TOLERATING MISCONDUCT

Willfully tolerating misconduct is unacceptable and a violation of the Code. It is a violation of the Code if a party knows of misconduct but takes no action to report it.

FALSE AND MALICIOUS ACCUSATIONS

Any person who makes a false, frivolous or malicious complaint of misconduct (as contrasted with complaints which, even if erroneous, are made in good faith) will be subject to disciplinary action. Depending on the nature of the allegation, a person making a false, frivolous or malicious report may also be subject to civil or criminal proceedings.

REPORTING, COMPLAINTS, INVESTIGATIONS, DISCIPLINE and FURTHER INFORMATION

Every person who is subject to the Code must report violations of the Code and suspicions or allegations of misconduct. Such reports may be made by contacting the U.S. Center for SafeSport (www.safesport.org) and, where applicable, **appropriate law enforcement authorities**.

USAA and the U.S. Center for SafeSport recognize that it can be difficult to report an allegation of misconduct and strives to remove as many barriers to reporting as possible. **Anonymous reports may be made verbally or in writing.**

In the event that any party is alleged to have violated the Code, or in the event that USAA receives a complaint or a report that is required to be referred to the U.S. Center for Safe Sport, USAA shall report and refer such matter to the U.S. Center for Safe Sport which shall have jurisdiction and authority over such matter; provided that such referral shall not supersede any local, state, or federal reporting requirements or jurisdiction.

All alleged violations of the Code over which the U.S. Center for SafeSport Response and Resolution Office does not exercise either exclusive or discretionary authority and falls within USAA's jurisdiction will be submitted to a hearing panel appointed by the USAA Board of Justice for resolution pursuant to the complaint procedures set forth in Article XV of the USAA Bylaws (available on the USAA website). If an alleged violation occurs when a team sponsored by USAA or the USOC is traveling to or from, or participating at, a competition and it is necessary to expedite the proceeding in order to resolve a matter relating to the competition, such matter shall be resolved pursuant to the expedited procedures set forth in Section 15.10 of Article XV which require that such complaint shall be heard and decided within twenty-four (24) hours of the filing.

The hearing panel will determine whether a violation of the Code has occurred and if so what discipline is warranted. Such discipline may include but is not limited to immediate

termination of employment; immediate dismissal from a USAA training camp, event or program, or a USAA or USOC sponsored team; being precluded from participating at USAA or USOC sanctioned events or other competitions; and being sent home at such person's own expense.

FURTHER INFORMATION

For guidance and questions regarding the Code please contact the U.S. Center for SafeSport (www.safesport.org).

USAA Conflict of Interest Policy

POLICY STATEMENT

USAA and its members are committed to conducting USAA's business affairs professionally and with integrity. As a result, those who work for or represent USAA in its corporate activities as USAA directors, officers, employees or volunteers (each a USAA Corporate Representative) must do so without person gain and in such a way that the organization's trust and reputation, and the confidence of its members and the public, are enhanced and maintained. **This policy does not apply to USAA members who do not serve as a director, officer or employee of USAA and who do not perform any corporate activities as a USAA volunteer. This policy also does not apply to USAA Corporate Representatives when they are not acting in their capacity as a representative of USAA in its corporate activities.**

REQUIRED CONDUCT

When acting in his or her capacity as a director, officer, employee or volunteer of USAA, each USAA Corporate Representative must act solely for the benefit of USAA and not for personal gain, avoiding all conflicts of interest and apparent conflicts of interest. Actual or apparent conflicts of interest must be immediately disclosed. Any USAA Corporate Representative with an established or potential conflict of interest must abstain from participating in any way in any discussion, negotiation or decision related to or affected by such conflict.

Decisions by USAA Corporate Representatives to have USAA hire or source materials from a vendor, supplier or contractor are to be made on the basis of objective criteria such as quality, price, reliability and service, and never on the basis of personal relationship or friendships or the opportunity for personal gain, financial or otherwise.

Gifts, hospitality and entertainment are neither to be given nor accepted by any USAA Corporate Representative, except those of nominal value exchanged in the normal course of business. Gifts of cash or financial instruments having a value of more than two hundred fifty dollars (\$250) shall never be accepted. Invitations from sports, media, entertainment and other organizations may be accepted by USAA Corporate Representatives if they are part of open and generally accepted practices, serve to promote the best interests of USAA, would not embarrass such USAA Corporate Representative or USAA if publicly disclosed and do not compromise the objectivity and integrity of the USAA Corporate Representative.

All USAA Corporate Representatives must protect and preserve USAA's assets and resources, including but not limited to such things as company time, materials, computers, information, equipment and supplies, and use such assets and resources for USAA-related purposes only and never for personal use without prior supervisory approval.

Definition of Conflict of Interest

A Conflict of Interest is defined as any conduct, outside activity, personal interest or personal relationship of a USAA Corporate Representative which may either interfere with or influence or appear to interfere with or influence, a person's ability to objectively perform their duties as a USAA director, officer or employee, or as a USAA volunteer performing corporate activities.

Examples of Conflicts of Interest

Examples of Conflicts of Interest include but are not limited to the following:

- A USAA Corporate Representative having a financial interest in a USAA vendor, supplier or contractor
- A USAA Officer or employee hiring or supervising a USAA employee that is a family member, relative, friend or business associate
- A USAA Officer or employee hiring a vendor, supplier or contractor owned or managed by a family member, relative, friend or business associate or any business owned by or affiliated with any such person
- A USAA Corporate Representative serving as a board member or officer of any organization with ideals or business interests that conflict with USAA's ideals, mission or business interests or serving in a role that decides whether or how another organization does business with USAA
- A USAA Corporate Representative receiving gifts, discounts, favors, personal or financial opportunity or anything else having a value over two hundred fifty dollars (\$250) from actual or potential vendors, suppliers, contractors or any other USAA Corporate Representative
- Any USAA Corporate Representative's family member, relative, friend or business associate or any business owned by or affiliated with any such person receiving any gift, discount, favor, personal or financial opportunity or anything of value from any USAA actual or potential vendor, supplier, contractor or any other USAA Corporate Representative, except in connection with independent and legitimate business relationships

Examples of Other Prohibited Conduct

Examples of other conduct prohibited by this Policy include but are not limited to the following:

- Excessive personal use by any USAA Corporate Representative of USAA assets or resources without prior supervisory approval
- The use by any USAA Corporate Representative of USAA resources for any personal or financial gain
- A USAA Corporate Representative soliciting gifts from a USAA vendor, supplier or contractor
- A USAA Corporate Representative extending or accepting inappropriate business entertainment
- A USAA Corporate Representative exploiting for personal gain USAA's information or data, including information regarding its Members

DISCLOSURE OF CONFLICTS

Any USAA Corporate Representative who has an actual, apparent or potential conflict of interest shall immediately disclose the conflict verbally to the Chairman of the USAA Board of Directors, or if the Chairman is the one reporting, the Chairman of the Board's Audit Committee, and within twenty four (24) hours of such verbal disclosure such USAA Corporate Representative shall provide a report in writing. The written report shall contain the name of the USAA Corporate Representative, the person or organization with whom there is the conflict, the date and circumstances of when the conflict first became known to such USAA Corporate Representative and a brief description of the conflict.

DECISIONS REGARDING CONFLICTS

All written conflict reports shall be submitted by the USAA Board to the USAA Ethics Committee. The Ethics Committee will review the report and determine whether an actual conflict of interest exists and if so whether the conflict may be waived. The Chair of the Ethics Committee shall render a decision, which shall be binding on USAA and the USAA Corporate Representative and which may contain any further qualifications or recommendations that the Ethics Committee believes appropriate with respect to such conflict. The fact that a conflict of interest exists may not mean that it is sufficiently material to be of practical importance to USAA, or if material, that upon full disclosure of all relevant information, that it is adverse to the interests of USAA or will disqualify the USAA Corporate Representative or any other party from continued involvement with USAA.

FALSE AND MALICIOUS ACCUSATIONS

Any person who makes a false and malicious complaint of a violation of this policy, as opposed to complaints which, even if erroneous, are made in good faith, will be subject to disciplinary action.

COMPLAINTS, INVESTIGATIONS AND DISCIPLINE

A person wishing to file a complaint may do so by contacting any USAA officer or director. All alleged violations of this policy will be submitted to the USAA Ethics Committee. The Ethics Committee will determine whether a violation of this policy has occurred and if so what discipline is warranted. Such discipline may include immediate termination of employment.

FURTHER INFORMATION

For guidance and questions regarding the USAA Conflicts of Interests Policy please contact the Chairman of the USAA Ethics Committee, the Chairman of the USAA Audit Committee or the CEO of USAA.

USAA Anti-Doping, Drugs and Alcohol Policy

POLICY STATEMENT

USAA is committed to maintaining work, training and sports environments where USAA athletes are able to attain their peak performance and USAA directors, officers, employees and volunteers are able to work both safely and responsibly. USAA believes that the consumption and/or abuse of alcohol and controlled substances is detrimental to a healthy state of mind, body and spirit in athletic competition and at work and is therefore committed to alcohol and drug-free work, training and sports environments.

As a member organization of the U.S. Olympic Committee, USAA and its members are required to comply with all anti-doping policies, procedures and protocols of the International Olympic Committee (IOC), World Archery, World Anti-Doping Agency (WADA), United States Anti-Doping Agency (USADA), and the United States Olympic Committee (USOC). The list of banned substances, policies and procedures, and protocols may change from time to time and it is the member's obligation to stay informed about these changes. Lists of banned substances and all policies and procedures can be found on USADA's website at www.usada.org. Policy violations, response resolutions and sanctioning will be determined by USADA or WADA for all anti-doping cases.

PROHIBITED CONDUCT AT USAA EVENTS

It is a violation of USAA policy for any USAA director, officer, employee, volunteer or member participating in any event, training camp or competition sanctioned by the National Archery Association (NAA), the US Olympic Committee (USOC) or USAA (a USAA Event) to consume alcohol or any controlled substances, or to have any alcohol or controlled substance in their system, during the hours in which any competitor is actively competing or shooting at any USAA Event.

It is a violation of USAA policy for any such person that has not reached the age of twenty-one (21) to consume alcohol at any time during any USAA Event. Such conduct is prohibited regardless of any local law, statute, ordinance or custom that may permit the consumption of alcohol by persons under the age of twenty-one (21).

It is a violation of USAA policy for any USAA director, officer, employee, volunteer or member to possess, sell or otherwise provide any controlled substance to, or encourage the use of any controlled substance by, any other person during any USAA Event or to sell or otherwise provide alcohol during any USAA Event to any person who has not reached the age of twenty-one (21).

USAA directors, officers, employees, volunteers and members who are twenty-one (21) or older are permitted to consume alcohol at a USAA Event after the hours in which competitors are actively competing or shooting at the USAA Event. However, it is a violation of USAA policy for any such person who chooses to consume alcohol at any USAA Event to display

any behavior or engage in any action that causes or may cause danger to themselves or others or damage to any property or which is unsportsmanlike, offensive or inappropriate for a representative of the USAA, the USA or the sport of archery.

PROHIBITED CONDUCT AT WORK

It is a violation of USAA policy for any director, officer or employee of USAA to consume alcohol or any controlled substances while conducting normal USAA work activities. In addition, no such person may report to work or perform any job duties for USAA while under the influence of alcohol or any controlled substance or any prescription drug that impairs their judgment or job performance. No such person may have any illegal controlled substance in their system or use, possess or sell controlled substances while on USAA work time or property.

Definition of Alcohol

Alcohol shall include all intoxicating beverages.

Definition of Controlled Substances

Controlled substances is defined as all non prescription controlled substances, all illegal drugs, all prescription or prescribed controlled substances when used to an excess in violation of doctors orders, to produce the state of intoxication in the participant or to enhance the performance of the participant, and all substances on the World Anti-Doping Agency's (WADA) recognized list of banned substances (which may be found at www.usantidoping.org). Tobacco is not considered a drug. In the event of a conflict between any federal and state or local law, the most strict law prohibiting the use of controlled substances shall apply Prescription drugs required by any person that is a member of any traveling USAA or USOC team during the course of the team's travel are not included in the definition of controlled substances so long as documentation by a physician and a Therapeutic Use Exemption form, have been filed in advance with USAA.

Examples of Prohibited Alcohol or Controlled Substance Consumption or Abuse

Examples of prohibited alcohol or controlled substance consumption or abuse include but are not limited to the following:

- Suggesting, encouraging, advising or condoning the use of controlled substances to enhance the performance of an athlete
- Sharing of prescription drugs with a teammate or other person that have not been prescribed for such person
- Reporting to work at USAA while taking prescription or over-the-counter drugs when the influence of such drugs would negatively affect such person's ability to perform their job duties safely and effectively or create an unsafe condition for other employees
- Drunk and disorderly behavior that endangers any person or damages any property at a USAA Event

FALSE AND MALICIOUS ACCUSATIONS

Any person who makes a false and malicious complaint of a violation of this policy, as opposed to complaints which, even if erroneous, are made in good faith, will be subject to disciplinary action

COMPLAINTS, INVESTIGATIONS AND DISCIPLINE

A person wishing to file a complaint may do so by contacting any of the following: any USAA officer or director, any Team Captain or Team Manager. All alleged violations of this policy will be submitted to a hearing panel appointed by the USAA Board of Justice for resolution pursuant to the complaint procedures set forth in Article XV of the USAA By-Laws (available on the USAA website). If an alleged violation occurs when a team sponsored by USAA, NAA or the USOC is traveling to or from, or participating at, a competition and it is necessary to expedite the proceeding in order to resolve a matter relating to the competition, such matter shall be resolved pursuant to the expedited procedures set forth in Section 15.10 of Article XV which require that such complaint shall be heard and decided within twenty-four (24) hours of the filing.

The hearing panel appointed by the Board of Justice will determine whether a violation of this policy has occurred and if so what discipline is warranted. Such discipline may include immediate termination of employment, immediate dismissal from a training camp, USAA Event or program, USAA, NAA or USOC sponsored team, being precluded from participating at USAA, NAA or USOC sanctioned events or other competitions and being sent home at the such person's own expense.

FURTHER INFORMATION

For guidance and questions regarding the USAA Drugs and Alcohol Policy please contact the Chairman of the USAA Ethics Committee the Chairman of the USAA Audit Committee or the CEO of USAA.

USAA Sportsmanlike Conduct Policy

POLICY STATEMENT

USAA and its members are committed to acting in a sportsmanlike manner consistent with the spirit of fair play and responsible conduct. USAA and its members are also committed to fair competition and respect for the members of other teams, their coaches and staff as well as all spectators and others who participate at any event, training camp or competition sanctioned by the National Archery Association (NAA) or the US Olympic Committee (USOC) or USAA (a USAA Event).

PROHIBITED CONDUCT

It is a violation of USAA policy for any USAA member to exhibit unsportsmanlike conduct at any USAA Event.

Definition of Unsportsmanlike Conduct

Unsportsmanlike Conduct is defined as any conduct that is inappropriate for an athlete, coach, judge or other official participating in a USAA Event, that evidences a lack of respect for such person's teammates, competitors, officials, spectators or the sport of archery, that intends to detract from the ability of a teammate or competitor to attain peak performance, that is not fitting behavior for a representative of the United States of America and the sport of archery or that is contrary to the generally understood principles of sportsmanship.

Examples of Unsportsmanlike Conduct

Examples of Unsportsmanlike Conduct include but are not limited to the following:

- Openly disputing or arguing with any decision by a judge or other official
- Using obscene or vulgar language that detracts from the ability of a teammate or competitor to attain peak performance, even if it is not directed at a particular person
- Intentionally disrupting or distracting a competitor in the course of competition
- Intentionally inaccurate scoring of any round of shooting
- Taunting of competitors, coaches, officials or others by means of baiting, ridiculing, threatening physical violence or physical violence

FALSE AND MALICIOUS ACCUSATIONS

Any person who makes a false and malicious complaint of unsportsmanlike conduct, as opposed to complaints which, even if erroneous, are made in good faith, will be subject to disciplinary action

COMPLAINTS, INVESTIGATIONS AND DISCIPLINE

A person wishing to file a complaint may do so by contacting any of the following: any USAA officer or director, any Team Captain or Team Manager. All alleged violations of this policy will be submitted to a hearing panel appointed by the USAA Board of Justice for

resolution pursuant to the complaint procedures set forth in Article XV of the USAA By-laws (available on the USAA website). If an alleged violation occurs when a team sponsored by USAA, NAA or the USOC is traveling to or from, or participating in, a competition and it is necessary to expedite the proceeding in order to resolve a matter relating to the competition, such matter shall be resolved pursuant to the expedited procedures set forth in Section 15.10 of Article XV which require that such complaint shall be heard and decided within twenty-four (24) hours of the filing.

The hearing panel appointed by Board of Justice will determine whether a violation of this policy has occurred and if so what discipline is warranted. Such discipline may include immediate termination of employment, immediate dismissal from a training camp, USAA Event or program, USAA, NAA or USOC sponsored team, being precluded from participating at USAA, NAA or USOC sanctioned events or other competitions and being sent home at the such person's own expense.

FURTHER INFORMATION

For guidance and questions regarding the USAA Sportsmanlike Conduct Policy please contact the Chairman of the USAA Ethics Committee the Chairman of the USAA Audit Committee or the CEO of USAA.

Whistleblower Policy

PURPOSE

USA Archery is committed to high standards of ethical, moral and legal business conduct. In line with this commitment, and USA Archery's commitment to open communication, this policy aims to provide an avenue for employees and others to raise serious concerns with reassurance that they will be protected from reprisals or victimization for whistleblowing.

This whistleblowing policy is intended to cover protections for you if you raise concerns such as:

- Incorrect financial reporting;
- Unlawful activity;
- Activities that are not in line with USA Archery policy, including the Code of Ethics or Code of Conduct;
- Activities, which otherwise amount to serious improper conduct.

SAFEGUARDS

Harassment or Victimization - Harassment or victimization for reporting concerns under this policy will not be tolerated.

Confidentiality - Every effort will be made to treat the complainant's identity with appropriate regard for confidentiality.

Anonymous Allegations - This policy encourages employees and others to put their names to allegations because appropriate follow-up questions and investigation may not be possible unless the source of the information is identified. Concerns expressed anonymously will be explored appropriately, but consideration will be given to:

- The seriousness of the issue raised;
- The credibility of the concern; and
- The likelihood of confirming the allegation from attributable sources

Bad Faith Allegations - Allegations in bad faith may result in disciplinary action.

PROCEDURE: 1. Process for Raising a Concern

Reporting - The whistleblowing procedure is intended to be used for serious and sensitive issues. Such concerns, including those relating to financial reporting, unethical or illegal conduct may be reported directly to:

Thomas M. James
The Law Office of Thomas M. James, P.C.

2 North Cascade Avenue, Suite 760
Colorado Springs, CO 80903
Telephone: 719/633-6211
Email: jamestm@tjames-law.com

Employment-related concerns should continue to be reported through your normal channels such as the Chairman of the Board or CEO.

Timing - The earlier a concern is expressed, the easier it is to take action.

Evidence - Although the reporter not expected to prove the truth of an allegation, they should be able to demonstrate to the person contacted that the report is being made in good faith.

PROCEDURE: 2. How the Report of Concern Will be Handled.

The action taken by USA Archery in response to a report of concern under this policy will depend on the nature of the concern. The Audit Committee of USA Archery's Board of Directors shall receive information on each report of concern and follow-up information on actions taken.

Initial Inquiries - Initial inquiries will be made to determine whether an investigation is appropriate, and the form that it should take. Some concerns may be resolved without the need for investigation.

Further Information - The amount of contact between the complainant and the person or persons investigating the concern will depend on the nature of the issue and the clarity of information provided.

Further information may be sought from or provided to the person reporting the concern.