



Whistleblower and Non-Retaliation Policy

I. General

USA Rugby's Code of Ethics requires directors, officers, employees, contractors, and volunteers to observe high standards of business and personal ethics in the conduct of their duties and responsibilities.

As employees and representatives of USA Rugby, we must practice honesty and integrity in fulfilling our responsibilities and comply with all applicable laws and regulations.

A whistleblower, as defined by this policy, is a director, officer, employee, contractor, or volunteer to member of USA Rugby who reports an activity that he or she considers to be illegal or dishonest.

II. Reporting Responsibility

It is the responsibility of all directors, officers, employees, contractors, and volunteers to comply with and to report violations or suspected violations of the Code of Ethics, USA Rugby policies, or laws in accordance with this policy.

III. No Retaliation

No director, officer, employee, contractor, or volunteer who, in good faith, reports a violation of the Code of Ethics, USA Rugby policies, or law shall suffer harassment, retaliation or adverse employment consequence.

An employee who retaliates against someone who has reported a violation in good faith is subject to discipline up to and including termination of employment.

This Whistleblower Policy is intended to encourage and enable employees and others to raise serious concerns within USA Rugby prior to seeking resolution outside USA Rugby.

IV. Reporting Violations

Directors, officers, employees, contractors, and volunteers should share their questions, concerns, suggestions or complaints with someone who can address them properly.

In most cases, directors, officers, employees, contractors, and volunteers should report to Human Resources.

However, if a director, officer, employee, contractor, or volunteer is not comfortable speaking with Human Resources, or is not satisfied with the response, that director, officer, employee, contractor, or volunteer is encouraged to report to the Chief Executive Officer.

V. 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 of the Code of Ethics, USA Rugby policy, or law. Any allegations that prove not to be substantiated and have been made maliciously or with knowledge that they were false will be treated as a serious disciplinary offense.

VI. Confidentiality

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

VII. Handling of Reported Violations

All reports will be promptly investigated and appropriate corrective action will be taken if warranted by the investigation. Human Resources will notify the complainant with acknowledgment of receipt of the suspected reported violation within 5 business days. The Audit Committee shall be informed of all such complaints or reports.