Department	Original Date	Responsible to
Human Resources	12/20/2004	President
Subject	**Revision Date**	**Page**
Whistleblower Policy for the Lakeshore National Adapted Sports Organization	10/09/2017 6/01/2022 9/22/2025	1 of 4

This policy and procedure rescinds any previous material covering this subject matter.

I. POLICY

Lakeshore Foundation has established procedures for employees, members, Board members, committee members, task force members, athletes, contractors, hearing panel members, and volunteers ("Individuals") to protect and report suspicions of wrongful conduct and/or fraudulent activities within the organization.

II. PROCEDURE

Individuals are encouraged to report confidentially, any wrongful conduct or fraudulent activity including accounting or financial fraud or malfeasance within LNASO. Individuals have a duty to report a complaint or alleged violation of LNASO policies and procedures, the Ted Stevens Olympic and Amateur Sports Act, U.S. Olympic and Paralympic Committee Bylaws, policies and procedures, and any applicable local, state or federal laws by using this email (ethics@Lakeshore.org) or by notifying their direct supervisor, if appropriate. Athlete safety violations must be reported as a Participant's obligations under the SafeSport Code. Nothing in this policy supersedes these obligations.

The ethics@Lakeshore.org email is not intended for general venting or complaints. Please direct those to your immediate supervisor or human resources. An online reporting portal is available here and can be found on lakeshore.org/activity.

Concerns of wrongful conduct posing actual or imminent danger or threats of violence to persons or property are to be immediately reported to the Police and/or 911.

III. INVESTIGATION

- The Director of Human Resources, the President and Chief Executive Officer (CEO) and the Chairman of the Board of Directors will be responsible for monitoring the ethics@Lakeshore.org email.
- All reports will be treated as confidential as possible, given there could be some need to disclose information during the investigation process.
- The Director of Human Resources will lead all investigations. In the event that

the complaint involves the Director Human Resources, the CEO will lead the investigation.

- The CEO and the Director of Human Resources make the determination on the alleged violations with applicable parties.
- In the event that the complaint involves the Director of Human Resources or the CEO, the determination will be made by the Chairman of the Board of Directors and/or Lakeshore Foundation legal team.
- Resolutions are executed by disinterested parties, including the Chairman of the Board of Directors and/or Lakeshore Foundation legal team.
- All necessary steps will be taken to address the matter as quickly and quietly as possible, up to and including termination of employment, membership or other association with Lakeshore Foundation.
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Any good faith reporter is protected under this policy.
Retaliation against any individual who reports, in good faith, wrongful conduct and/or participates in the investigation is prohibited. Knowingly making a false report is a violation of this policy and may be reported as such.

No employee, contractor, agent, volunteer, or LNASO as an NGB shall take or threaten to take any action against an athlete as a reprisal for disclosing information to or seeking assistance from the Office of the Athlete Ombuds as outlined in Section 220509(b)(5) of the Act.

IV. DEFINITIONS

Good Faith – an honest, reasonable belief that wrongful conduct has occurred or is occurring.

Retaliation – As defined in Section 220501(b)(11) of the Act, any adverse or discriminatory action, or the threat of an adverse or discriminatory action, including removal from a training facility, reduced coaching or training, reduced meals or housing, and removal from competition carried out against a Protected Individual as a result of any communication, including the filing of a formal complaint, by the Protected Individual or a parent or legal guardian of the Protected Individual relating to the allegation of physical abuse, sexual harassment, or emotional abuse, with the United States Center for SafeSport; a coach, trainer, manager, administrator, or official associated with the USOPC; the United States Attorney General; a federal or state law enforcement authority; the Equal Opportunity Employment Commission; or Congress. Retaliation also refers to any adverse or discriminatory action, or the threat of an adverse or discriminatory action, against any person who in good faith reports misconduct, and/or violations of the USOPC's or NGBs' Bylaws, policies, and procedures. Athletes who disclose information to or seek assistance from the Office of the Athlete Ombuds are also protected from retaliation as set forth in Section 220509(b)(5) of the Act.

Wrongful Conduct – illegal, dishonest, immoral, discriminatory, or fraudulent activity including accounting fraud or malfeasance that constitutes a serious violation of Lakeshore policies and procedures, state, or federal laws.

V. RESOURCES

Office of the Athlete Ombuds

Team USA athletes may contact the Office of the Athlete Ombuds for independent and confidential advice on a variety of sport-related matters, including their rights, applicable rules, policies or processes, and questions related to resolving disputes and grievances. The Athlete Ombuds can also help Team USA athletes connect with legal, mental health, and other support resources. All other NGB athletes (i.e., athletes competing at the masters, recreational, or youth level) are welcome to visit the Athlete Ombuds website to review informational resources and should work directly with their NGB to understand additional resources and options available to them.

Contact Information Phone: 719-866-5000

Email: ombudsman@usathlete.org

Website: usathlete.org

USOPC Integrity Portal

The USOPC is committed to providing a positive, healthy, and safe environment, and promoting a culture of integrity within the United States Olympic and Paralympic community. An important part of this commitment is the USOPC's Integrity Platform, which includes reporting mechanisms that allow members of our community to report their concerns either confidentially or anonymously.

https://www.usopc.org/reporting-a-concern