Lakeshore National Adapted Sports Organization

SPORT INTEGRITY POLICY

1. Purpose

Integrity is fundamental to the credibility, fairness, and sustainability of sport. The Lakeshore National Adapted Sports Organization (LNASO) is committed to upholding the principles of honesty, ethical conduct, and fair competition, ensuring that all participants engage in sport in a manner that maintains public confidence and respect, and consistent with the IOC Olympic Movement Code on the Prevention of the Manipulation of Competitions and the IPC Codes of Ethics (as applicable). This policy recognizes the increasing risks to sporting integrity, including corruption, match-fixing, misuse of insider information, and other inappropriate involvement in sports betting. Such behaviors threaten the core values of sport and undermine the safety, welfare, and reputation of athletes, officials, organizations, and competitions.

This policy provides a framework for identifying, mitigating, and responding to integrity threats; outlines **LNASO's** expectations, responsibilities, and prohibited conduct for all participants; and supports education, monitoring, and enforcement measures to protect the sport from improper influence. This policy does not attempt to provide an exhaustive list of every possible circumstance in which an integrity threat may occur. Instead, by promoting awareness, accountability, and transparency, this policy aims to safeguard fair competition, protect participants from harm, and preserve the trust of fans, stakeholders, and the broader sporting community.

2. Applicability of Policy

This Sport Integrity Policy is applicable to all LNASO Covered Individuals. Where reasonable and relevant, LNASO contractors will be required to comply with this policy in their contracts.

All Covered Individuals who participate in an Applicable Competition are required to comply with the integrity standards outlined in the policy. Integrity obligations commence from the time a participant is selected, accredited, or otherwise becomes eligible to participate in an Applicable Competition and shall continue until all competition-related obligations, including post-event processes, have concluded.

3. Definitions

"Applicable Competition" refers to any activity that is sanctioned, authorized, conducted, administered, or otherwise recognized by LNASO, whether domestic or international; any activity in which LNASO selects Covered Individuals to participate; or any competition where the USOPC

officially designates entrants. Applicable Competitions include, but are not limited to, the: Olympic and Paralympic Games; Pan American and Parapan American Games; World Championships and other major international competitions where individual and/or team selection is made by LNASO; and National championships and trials that serve as qualification events for Protected Competitions.

"Covered Individuals" include all LNASO employees, board members, committee and/or task force members with access to high performance information national team athletes and staff (including all coaches, performance staff and personal care attendants), officials, and any other volunteers with access to Inside Information.

"Inside Information" includes: any non-public information that could affect competition outcomes or be used for betting purposes. Examples of Inside Information include, but are not limited to, non-public injury or health information; team selection decisions prior to public announcement; competition strategies or tactics; and training or coaching details.

"Sports Betting" or **"Sports Wagering"** includes, attempts to bet, offers to bet, agreements to bet, soliciting betting, facilitating betting, or inducing another to bet on an Applicable Competition, whether or not the wager is ultimately accepted or settled.

4. Prohibitions and Requirements

A. Prohibition on Betting

Covered Individuals may not engage in any form of Sports Betting and/or Sports Wagering on Applicable Competitions. Covered Individuals are prohibited from engaging in any form of wagering, gambling, or staking of money or any other thing of value (whether monetary or non-monetary) in return for accepting or receiving (directly or indirectly) benefits or other things of value (whether monetary or non-monetary) based on the outcome, progress, conduct, or any other competitive aspect of an Applicable Competition.

Prohibitions on Sports Betting or Sports Wagering extend to include, without limitation, wagers placed directly or indirectly: with licensed, unlicensed, domestic or international betting operators (including through licensed or unlicensed sport books, fantasy sport leagues, and futures and/or prediction contracts); through intermediaries or third parties; through use of cash, credit, digital assets, or any other means of payment; and on behalf of oneself or another person on any Applicable Competition.

B. Prohibition on Manipulation

Covered Individuals may not influence, manipulate, or attempt to influence or manipulate any competitive aspect of an Applicable Competition in a way such that the outcome or any other aspect of the competition is determined (in whole or in part) by something other than the competitors' merits. Examples include, but are not limited to: the result, score, margin, or placing; individual athlete or team performance; statistics, or conduct; specific actions or incidents occurring during a competition (including prop/spot bets); and decisions made by officials.

C. Prohibition on Disclosing Inside Information for Betting

Covered Individuals may not request or disclose, directly or indirectly to any individual that does not have a legitimate need to know, any Inside Information that the individual knows or should have known might lead to the information being used for purposes of Sports Betting related to Applicable Competitions. Examples of such non-public information include, but are not limited to, injury or health information, competitive strategy, and training or coaching details.

D. Prohibition on Indirect Violations

Covered Individuals may not direct, request, or encourage third parties to engage in the prohibitions contained in this policy on the Covered Individuals' behalf.

Covered Individuals are prohibited from accepting or receiving benefits or other things of value in connection with sports betting, the disclosure of inside information, and/or competition manipulation.

Covered Individuals are prohibited from soliciting, facilitating, or encouraging other Covered Individuals to bet, wager, or gamble on Applicable Competitions, disclose inside information, or manipulate any aspect of an Applicable Competition.

E. Duty to Report and Cooperate

All Covered Individuals have a continuing obligation to promptly report to LNASO and/or the USOPC any conduct, incident, approach, invitation, or information the individual knows, suspects, or reasonably should suspect, may constitute a violation of this Sport Integrity Policy or any related integrity rules (e.g., LNASO Code of Conduct, the IOC/IPC Code of Ethics). Failure to report such violations may be considered a violation of the policy and may result in disciplinary action or related sanctions.

All Covered Individuals have a duty to cooperate with LNASO and/or the USOPC in investigating violations of the NGB's policy and the USOPC Sport Integrity Policy. Cooperation may include sitting for interviews within a reasonable amount of time and providing documentation. Note that the failure to cooperate with any investigation may be considered a violation of the policy and subject the individual to sanctions.

5. Procedures for Reporting, Reviewing, and Managing Reported Integrity Concerns

Integrity concerns must be timely reported to the Director of Human Resources at ethics@lakeshore.org. Upon receipt, they will notify the Chief Program Officer who is responsible for referring ethics concerns to the appropriate party for review. This process follows the steps outlines in the LNASO Response and Resolution policy linked here.

Anyone reporting a perceived violation of this policy must be acting in good faith and have some basis for believing there may be a violation. Anyone who makes a false report knowing that it is false or that is has no basis is in violation of this policy and the LNASO Code of Conduct. Such a

violation may itself be reported under this policy and may lead to serious consequences.

LNASO has a zero tolerance for retaliation against individuals who make good faith reports of potential ethical, policy, or legal violations, and who cooperate with investigations of the report. Consult the LNASO Whistleblower & Anti-Retaliation Policy linked here for more details.

Individuals may also report integrity concerns to the USOPC Integrity Portal and/or the IOC/IPC Integrity Hotlines. Upon receipt of any reported integrity concern involving Protected Competitions (as defined by the USOPC Bylaws), the LNASO compliance contact will immediately notify the USOPC Chief Ethics & Compliance Officer of the potential violation(s). LNASO is committed to assisting the IOC/IPC, the international Federations it works with (WWR, WPPO and WB), and the USOPC in ensuring integrity in sport. Where the IOC/IPC, WWR, WPPO, WB**,** or the USOPC assert jurisdiction over an integrity review or investigation.

Covered Individuals will fully cooperate with the review. LNASO will recognize and enforce integrity-related sanctions issued by the IOC/IPC, WWR, WPPO or WB**,** and/or the USOPC.

6. Education and Training

The sports integrity landscape is ever evolving. To assist in promoting a culture of integrity, transparency, accountability, and respect for fair competition LNASO will provide Covered Individuals on an annual basis materials designed to support education and awareness of key sport integrity issues, including, but not limited to: competition manipulation, sports betting, misuse of insider information, reporting obligations, and ethical decision-making. By building knowledge and practical understanding, the materials aim to equip athletes, coaches, officials, administrators, and support personnel with the tools to recognize integrity risks and to appropriately respond.

7. LNASO Resources

The Chief of Programs is responsible for this policy and its enforcement. The Director of Human Resources oversees compliance for the organization in cooperation with the Chief of Programs. They can be contacted directly at debbies@lakeshore.org, ethics@lakeshore.org or via phone at 205-313-7400 with any questions about this policy.

8. Additional Resources

Individuals who wish to report concerns related to this policy as it relates to involvement in the Olympic and Paralympic Movement, or are uncomfortable reporting a concern directly to LNASO**,** may also submit a report using the USOPC Integrity Portal. The Integrity Portal allows individuals to submit concerns to the USOPC confidentially and/or anonymously. Reports may be made online or by telephone.

Website: usopc.ethicspoint.com

Hotline: 877-404-9935

Individuals may also report any suspected or known manipulation of an Olympic or Paralympic competition to the relevant authority, including the IOC Integrity Hotline integrity@olympic.org or IPC Whistleblower Channel (as appropriate).

Team USA athletes may contact 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 counsel or mental health resources if needed. All other NGB athletes (i.e., athletes competing domestically at the masters or youth level, recreational athletes, foreign athletes), 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.

Email: ombudsman@usathlete.org

Website: www.usathlete.org