

## **USHJA POLICY STATEMENT**

**Subject: Whistleblower Protection Policy**

**Policy Number: GA114**

**Date of Board Adoption: July 14, 2025**

**Board Approved Effective Date: July 14, 2025**

The Whistleblower Protection Policy (“Policy”) of the United States Hunter Jumper Association, Inc. (“USHJA”) is intended to encourage and enable its employees, volunteers, Officers, and Directors to alert USHJA to a violation of USHJA policy, or an illegal act, by USHJA, its employees, volunteers, Officers, or Directors (“Violation”) in order that USHJA can address and correct such Violations.

1. Application. This Policy applies to all USHJA employees, whether full-time, part-time, or temporary employees, to all volunteers, to all who provide contract services, and to all Officers and Directors, each of whom shall be entitled to protection when reporting a Violation (collectively “Protected Person”).

2. Reporting. USHJA encourages anyone reporting a Violation to identify himself or herself when making a report to facilitate the investigation of the Violation. However, reports may be submitted anonymously.

The Protected Person making the report shall report the Violation to USHJA’s General Counsel (“ Compliance Officer”) who shall review the complaint to determine whether it meets the standards and intent of the Policy. Following review and determination, the Compliance Officer shall report the findings to the Audit Committee. In the case of a conflict involving the Compliance Officer or a member of the Audit Committee, that individual shall be recused from all further discussion. In the case that the General Counsel is the subject of the Complaint, the report shall be made to the President of the Board of Directors who shall engage outside legal counsel. If the complaint also concerns the President, the report shall be made to one of the National Officers who shall then be authorized to seek outside legal counsel.

A Protected Person reporting a Violation must do so in good faith and with a reasonable basis for suspecting or knowing of the Violation. All Protected Persons shall cooperate with any related investigation and provide truthful information.

3. Investigation and Report. The Compliance Officer and Audit Committee shall be responsible for investigating reported Violations and preparing a written report of the investigation to the Board of Directors. All actions of the Compliance Officer and Audit Committee in receiving and investigating the report and additional information shall endeavor to protect the confidentiality of all Protected Persons.

In completing the investigation and report, the Compliance Officer, in addition to the Audit Committee, may exercise discretion to enlist the assistance of other members of the Board of Directors, outside counsel, and other outside experts. Anyone assisting the Compliance Officer shall be notified of the confidentiality requirements of this Policy.

Before engaging outside counsel or experts, the Compliance Officer must communicate with USHJA's Executive Director to budget for professional costs associated with the investigation and report. If a conflict of interest exists with the Chief Financial Officer, the Executive Director, in coordination with the Compliance Officer shall appoint another staff member to act in his/her place for purposes of facilitating the investigation and report. In hiring outside counsel and experts, the Compliance Officer shall consider the geographic location, qualifications, and costs, among other pertinent criteria, of counsel and experts when engaging them.

If the Violation implicates, or would constitute a conflict of interest for, the Compliance Officer or member of the Audit Committee, the other may proceed in conducting the investigation, however, if the conflict concerns Legal Counsel, outside legal counsel shall be engaged to review the legal sufficiency of the complaint in the first instance. If both Compliance Officer and members of the Audit Committee are conflicted, then the Board of Directors shall, by simple majority, vote to appoint a non-conflicted member of the Audit Committee or the Board of Directors to act in place of the Compliance Officer or conflicted member of the Audit Committee for purposes of responsibilities and authority under this Policy.

4. Remedial Action. Only the Board of Directors shall implement remedial actions in response to a Violation or the written report of the investigation. The Compliance Officer and Audit Committee may, however, recommend suggestions for remedial action.

The person who is the subject of a whistleblower complaint shall not be present at, or participate in, Board deliberations or a vote on the matter relating to such complaint, provided that the Board may request that the person who is the subject to the complaint present information as background or answer questions at a Board meeting prior to the commencement of deliberations or voting relating thereto.

5. Confidentiality. Reports of Violations or suspected Violations will be kept confidential to the extent possible, with the understanding that confidentiality may not be maintained where identification is required by law or in order to enable the organization or law enforcement to conduct an adequate investigation.

Breaches of confidentiality under this Policy will be taken seriously and may result in action by the Conduct Committee. Upon a breach, the Compliance Officer may exercise discretion to notify the Protected Person of the breach.

The following actions taken by the Compliance Officer and Audit Committee are permitted and will not constitute a breach of confidentiality: (1) any act necessary to carry out responsibilities under this Policy; (2) steps taken to communicate with USHJA's insurance carrier, and to potentially file a claim with the carrier or seek reimbursement of professional fees/costs; (3) communications with legal counsel and other outside experts; (4) communications with USHJA staff to effect payment to outside counsel or other experts; and (5) communications with law enforcement if deemed necessary at the discretion of the Compliance Officer.

6. Protection from Retaliation. No Protected Person shall be subjected to retaliation, intimidation, harassment, or other adverse action for reporting information in accordance with this Policy or for cooperating with an investigation. Any person entitled to protection who believes that he or she is the subject of any form of retaliation for such participation should immediately report the same as a Violation of and in accordance with this Policy.

Any USHJA employee, volunteer, Officer, or Director who retaliates, intimidates, harasses, or takes other adverse action against a Protected Person who has reported a Violation in good faith or who, in good faith, has cooperated in the investigation of a Violation, is subject to discipline, including but not limited to termination of employment or volunteer status.

7. Dissemination and Implementation of Policy. This Policy shall be disseminated in writing to all employees, volunteers, Officers, and Directors. Written acknowledgement shall be required in the manner consistent with status within organization. USHJA shall adopt procedures for implementation of this Policy, which may include:

- (1) Documenting Violations reported to Compliance Officer;
- (2) Keeping the Board of Directors and/or the Audit Committee informed of the progress of the investigation;
- (3) Interviewing employees;
- (4) Requesting and reviewing relevant documents, and/or requesting that an auditor or counsel investigate the complaint; and
- (5) Preparing a written record of the reported violation and its disposition, to be retained in USHJA records for a specified period of time.

Following completion of any investigation, complainant shall be notified by electronic and/or regular mail about the status of the complaint, to what extent the complainant's identity has been disclosed and any other confidentiality and privacy limitations.