

UNITED STATES GOLF ASSOCIATION

Speak Up Program

Revised June 2020

Overview

The USGA is committed to maintaining the highest standards of ethics and integrity in everything we do. The Speak Up Program is intended to encourage and enable staff, executives, committee members, volunteers and vendors to raise ethical and legal concerns within the organization, without any fear of retaliation.

Why Speak Up?

Each of us must do our part to keep the internal and public trust in the USGA. The Speak Up Program gives the USGA the opportunity to be notified of a potential issue, to investigate and to take remedial action, if necessary.

No Retaliation

The USGA is committed to protecting the rights of those who report issues in good faith. All reports can be made without any fear of retaliation. To the extent reasonably possible, all reports will be kept confidential.

What Concerns Should I Speak Up About?

If you become aware of conduct that you suspect may be a violation of either USGA policy or the law, you should speak up immediately. If you are uncertain as to whether a compliance issue exists, it is better to err on the side of expressing your concerns. Potential issues subject to the reporting requirement may include:

- Irregularities in accounting, financial or internal controls
- Fraud, theft, bribery and other corrupt business practices
- Falsification of USGA records, reports, or contracts
- Conflicts of interest
- Violation of USGA Code of Conduct
- Unauthorized disclosure of confidential information
- Discrimination, harassment or retaliation
- Concerns about safety in the workplace
- Other issues involving dishonesty or questionable integrity

These are just examples. If you suspect violation of any USGA policy or the law, you should report it right away.

Reporting Process:

Internal Reporting

It is the responsibility of the staff, executives, committee members, volunteers and vendors to report all potential violations. The USGA has an open-door policy and encourages everyone to share their questions, concerns, suggestions or complaints directly with their supervisor and, in the case of volunteers and vendors, their primary contact at the USGA. This can be done either in-person or in writing. If you are a staff member and uncomfortable approaching your supervisor or not satisfied with your supervisor's response, or it would be inappropriate to do so given the circumstances, you should feel free to raise the concern to your Executive Leadership Team member, a member of the People Team or directly to the Chief Legal Officer. Unless you are reporting a potential violation directly to the Chief Legal Officer, the person receiving the information from you will further raise the concern to the Chief Legal Officer, who will be charged with reviewing and investigating the reported concern.

Third Party Reporting Service

If you do not feel comfortable reporting your concern to someone internally at the USGA or you wish to remain anonymous, then you can report your concern to the USGA's third-party reporting service either online at www.usga.ethicspoint.com or by phone at **855-874-2744**. This is a free 24-hour service available to anyone to report a potential violation. A third-party specialist will document your concern and convey the information to a designated USGA representative.

The information you provide will be kept confidential, except as needed to conduct an investigation. You may choose to remain anonymous and have the option to have your identity, phone number or IP address not be recorded or included in any report provided to the USGA. Remember: what matters most is what is being reported, not who reports it.

Handling of Reported Violations

All reports will be reviewed and, if appropriate, investigated, and corrective action will be taken if necessary. While the USGA is obliged to inform any implicated persons that a concern has been reported, your involvement will not be disclosed to them unless such disclosure is reasonably necessary, or you remain anonymous. You can help us protect confidentiality by being discreet and not discussing your report with anyone else. While the Chief Legal Officer may notify you of the status upon resolution of the matter, please keep in mind that the USGA will not disclose the details of the investigation and any remedial measures taken, if any.

