

# WHISTLEBLOWER POLICY FOR THE UNITED STATES PRACTICAL SHOOTING ASSOCIATION/IPSC

The United States Practical Shooting Association/IPSC, a Delaware not for profit corporation (the “**Corporation**”), requires its directors, officers, members of the Corporation (“**Members**”), Members holding a position on a committee of the Corporation, employees, volunteers, advisors, agents, consultants, representatives, and contractors and subcontractors of the Corporation (each, a “**Corporate Individual**”) to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. As employees and representatives of the Corporation, we must practice honesty and integrity in fulfilling our responsibilities and comply with all applicable laws and regulations.

## ARTICLE I PURPOSE

**Section 1.01** The purpose of this whistleblower policy (the “**Policy**”) is to:

- (a) encourage and enable Corporation Individuals to raise concerns regarding suspected illegal or unethical conduct or practices, or violations of these policies on a confidential and, if desired, anonymous basis.
- (b) protect Corporate Individuals from retaliation for raising such concerns.
- (c) establish policies and procedures for the Corporation to:
  - (i) receive and investigate reported concerns; and
  - (ii) address and correct inappropriate conduct and actions.

## ARTICLE II REPORTING RESPONSIBILITY

**Section 2.01 Reporting Responsibility.** Each Corporate Individual has the responsibility to report in good faith any concerns about actual or suspected violations of the Corporation’s policies or any federal, state, or municipal law or regulation governing the Corporation’s operations (each, a “**Concern**”). Appropriate subjects to report under this Policy include but are not limited to financial improprieties, accounting or audit matters, ethical violations, or other similar illegal or improper practices, such as:

- (a) fraud.
- (b) theft.
- (c) embezzlement.
- (d) bribery or kickbacks.

- (e) misuse of the Corporation's assets.
- (f) undisclosed conflicts of interest.

**Section 2.02 Acting in Good Faith.** Anyone reporting a Concern must act in good faith and have reasonable grounds for believing the information disclosed indicates a violation of law and/or ethical standards. Any unfounded allegation that proves to have been made maliciously, recklessly, or knowingly to be false will be viewed as a serious offense and result in disciplinary action up to and including termination from the position within the Corporation.

### **ARTICLE III NO RETALIATION**

**Section 3.01** No Corporate Individual who in good faith reports a Concern or participates in a review or investigation of a Concern shall be subject to harassment, retaliation, or, in the case of a Member, adverse membership consequences because of such report or participation. This protection extends to Corporate Individuals who report in good faith, even if the allegations are, after an investigation, not substantiated.

**Section 3.02** No Corporate Individual will be subject to liability or retaliation for disclosing a trade secret in compliance with 18 U.S.C. § 1833 either:

- (a) in confidence to a federal, state, or local government official or to an attorney solely for the purpose of reporting or investigating a Concern; or
- (b) in a complaint or other document filed in a lawsuit or other proceeding under seal.

**Section 3.03** Any Corporate Individual who retaliates against someone who in good faith has reported or participated in a review or investigation of a Concern will be subject to discipline, up to and including termination from the position within the Corporation.

**Section 3.04** Anyone who believes that a Corporate Individual has been subject to harassment, retaliation, or adverse employment consequences as a result of making a good faith report or participating in a review or investigation of a Concern should contact the Compliance Officer listed in Article V of this Policy.

### **ARTICLE IV CONFIDENTIALITY**

**Section 4.01** The Corporation encourages anyone reporting a Concern to identify themselves in order to facilitate the investigation of the Concern. However, Concerns may be submitted on a confidential and/or anonymous basis. The Corporation shall take reasonable steps to protect the identity of the Corporate Individual, and shall keep reports of Concerns confidential to the extent possible, consistent with the need to conduct an adequate investigation.

**ARTICLE V  
REPORTING PROCEDURES**

**Section 5.01 Prompt Reporting.** All Concerns should be reported as soon as practicable consistent with this Policy.

**Section 5.02 Reporting Concerns.**

(a) Members and volunteers should first discuss the Concern with their respective Area Directors. The Member or volunteer should follow the procedures outlined in Section 5.02(b) if any of the following apply:

- (i) the Member or volunteer reasonably believes that the Area Director will disregard or otherwise not fairly consider the Concern.
- (ii) the Area Director is a subject of the Concern.
- (iii) the Member or volunteer does not feel comfortable discussing the Concern with the Area Director.

(b) Concerns should be reported in writing to the [Executive Director of the Corporation]<sup>1</sup> (the “**Compliance Officer**”). When reporting Concerns, the Corporate Individual should describe in detail the specific facts that support the report. The report may be sent to the Compliance Officer by email to [ALAN@USPSA.ORG](mailto:ALAN@USPSA.ORG) or by regular mail to:

ALAN TURNER  
901 METCALF ST.  
+1 (360) 855-2245

If the Compliance Officer is the subject of the Concern or the Corporate Individual is not comfortable reporting the Concern to the Compliance Officer, the Concern may alternatively be reported to:<sup>2</sup>

DAN CLICK  
PRESIDENT OF THE BOARD  
901 METCALF ST  
[DAN.CLICK@USPSA.ORG](mailto:DAN.CLICK@USPSA.ORG)

**Section 5.03 Questions.** Any questions relating to the scope, interpretation, or operation of this Policy should be directed to the Compliance Officer.

**Section 5.04 Investigation of Reported Concerns.**

(a) **Compliance Officer.** The Compliance Officer is responsible for:

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<sup>1</sup> **Note to Draft:** Please confirm whom you want to serve as the Compliance Officer.

<sup>2</sup> **Note to Draft:** Please confirm whom you want to serve as an alternative to the Compliance Officer.

(i) promptly investigating or overseeing the investigation of each reported Concern.

(ii) advising the Board of Directors (the “**Board**”) of each reported Concern.

(iii) reporting compliance activity to the full Board at each regularly scheduled Board meeting.

(b) **Acknowledgment of Receipt.** Any Board member who receives a report of a Concern must promptly notify the Compliance Officer of such report in writing. The Compliance Officer shall notify the reporting individual and acknowledge receipt of each reported Concern within five (5) business days, unless the report was submitted anonymously or no return address is provided.

(c) **Investigation.** The Compliance Officer shall conduct a prompt, discreet, and objective review or investigation based on the submitted report. A full investigation may not be possible if a report made anonymously is vague or general. If deemed necessary in his or her sole discretion or upon the recommendation of the Board, the Compliance Officer may engage legal counsel, accountants, or other experts to assist in the investigation. The Compliance Officer may delegate the investigation responsibilities to any Board committee or other individual, including third parties, as long as:

(i) the delegate is not a subject of the reported Concern.

(ii) the delegation does not compromise the identity of the Corporate Individual who reported anonymously or confidentially.

(d) **Resolution.** The Compliance Officer shall:

(i) recommend appropriate corrective action to the Board, if warranted by the investigation.

(ii) oversee the implementation of a resolution based on the determination of the Board.

(iii) follow up with the reporting individual, if possible, for closure of the reported Concern.

(e) **Accounting and Auditing Matters.** The Compliance Officer shall immediately notify the chairman of the Audit Committee and the Board of any Concerns regarding accounting practices, internal controls, or auditing, and shall work with the chairman of the Audit Committee and the Board until the matter is resolved.

**ARTICLE VI  
PERIODIC REVIEWS**

**Section 6.01** To ensure that the Corporation operates in a manner consistent with charitable purposes and does not engage in activities that could jeopardize its reputation or tax-exempt status, the Board shall conduct periodic reviews of this Policy.

**ARTICLE VII  
MISCELLANEOUS**

**Section 7.01** The Corporation shall retain any records related to the investigation and resolution of a reported Concern as required by the Corporation's Records Retention and Destruction Policy. All such records are considered privileged and strictly confidential.

**Section 7.02** This Policy shall be distributed to all Corporate Individuals. Failure to comply with the Policy may result in discipline or removal, up to and including removal from the applicable position within the Corporation and termination of membership.

**Section 7.03** This Policy was adopted by the Corporation's Board at its meeting on [●], 2025.