



**REPORTING FRAUDULENT ACTIVITIES
AND/OR UNETHICAL BEHAVIOR –
WHISTLE-BLOWER HOTLINE**



OUR COMMITMENT:

It is the policy of the United States Tennis Association Incorporated (the "USTA") and its family of companies (together, the "Organization") to conduct business and promote the development of tennis according to the highest level of ethical standards and professional integrity by maintaining a workplace that is free of fraudulent activity and unethical behavior so as to maintain the complete confidence of our members, volunteers, employees and business partners.

REPORTING SUSPECTED VIOLATIONS OF OUR POLICY:

Although USTA's policies specify various individuals within the Organization to whom fraudulent activity and unethical behavior can be reported, there may be a time when a person might feel apprehensive in directly approaching such individuals and would prefer to make an anonymous report. In order to provide such capability, the USTA has contracted with EthicsPoint, an independent service provider specializing in secure and anonymous "Whistle-blower / Hotline" services. The services provided by EthicsPoint enable you to anonymously report a suspected violation of policy via the EthicsPoint phone service or Web site. EthicsPoint will make the information in your anonymous report available only to selected individuals within the Organization and it will be handled in a discreet and confidential manner.

DISPOSITION OF REPORTS:

No person reporting a suspected violation will be made to suffer public embarrassment or be subject to retaliation because of any good faith report he or she makes. Any employee or volunteer associated with the USTA family of companies who is found to be responsible for reprisals against individuals who in good faith report known or suspected violations will be subject to disciplinary action, up to and including termination or dissociation where appropriate. However, the submission of a report which is known to be false or that is made with reckless disregard as to its truth also constitutes unethical behavior and will result in disciplinary action, up to and including termination or dissociation where appropriate.

All reported violations will be promptly investigated and will be treated confidentially to the extent consistent with enforcing the Organization's policies.

All investigations will be supervised by the Ethics Officer (General Counsel of the USTA) and may involve other appropriate officials within or outside the Organization whose participation in an investigation is necessary to address the matters contained in a report. The Chair of the Audit Committee of USTA's Board of Directors will monitor the disposition of all reports and assist in the investigations to the extent necessary. Employees and volunteers are expected to cooperate in the investigation of any alleged violation of the Organization's policies and hold such cooperation in confidence consistent with this policy and to the extent permitted by law. If an investigation indicates that corrective action is required, management of the company involved will decide what steps should be taken to rectify the problem and avoid its recurrence.

It is imperative that persons filing reports not conduct their own investigation. Acting on your own may compromise the integrity of an investigation and could adversely affect both you and the Organization.

HOW TO SUBMIT A REPORT TO ETHICSPPOINT:

- Call EthicsPoint at (866)654-6516 or
- Access the EthicsPoint Web site at www.ethicspoint.com and follow the instructions.

For additional information about filing a report and tracking its progress, see the section in this booklet entitled "How to File a Report."

For additional information about EthicsPoint and reporting suspected misconduct generally, see the section which follows entitled "Questions and Answers about EthicsPoint and Reporting Suspected Misconduct Generally."



QUESTIONS AND ANSWERS ABOUT ETHICSPPOINT AND REPORTING SUSPECTED MISCONDUCT GENERALLY

Q. What is EthicsPoint?

EthicsPoint is a comprehensive, confidential and anonymous Internet and telephone based reporting tool that assists management, employees and volunteers to work together to address fraud, abuse, misconduct, and other violations in the workplace, while helping to cultivate a positive work environment.

Q. May I report using either the Internet or the telephone?

Yes you may. By giving you a choice, EthicsPoint helps ensure that you can submit a report anonymously and in the manner most comfortable or convenient for you.

Q. Why do we need a system like EthicsPoint?

There are several reasons why we need a reporting tool:

1. Employees and volunteers are the Organization's most important asset. Through open channels of communication, you can participate in improving the Organization and help create and maintain a safe and ethical environment.
2. Publicly traded companies are required by law (Sarbanes-Oxley Act of 2002) to have an anonymous reporting system to address accounting and auditing misconduct. As a result, this is considered a "Best Practice" for non-public for-profit companies and for not-for-profit organizations like us.
3. Reporting "hotlines" have proven to be an effective tool in reducing losses and helping to protect corporate financial strength.

Q. Does management really want me to report?

Yes. In fact, we need you to report. You know what is going on in your department / division / company—both good and bad. You may have initial knowledge of an activity that may be cause for concern. Your reporting can minimize the potential negative impact on the USTA family of companies and their people. Also, offering positive input may help identify issues that can improve corporate culture and performance.

Q. Why should I report what I know? What's in it for me?

We all have the right to work in a positive environment and with that right, comes the responsibility of acting in an ethical manner and letting the appropriate people know if someone is behaving improperly. By working together, we can maintain a healthy and productive environment. Corporate or individual misconduct can threaten the livelihood of an entire organization, especially a National Governing Body like the USTA, where loss of reputation in any of the USTA family of companies can have serious consequences for all of them.

Q. What type of situations should I report?

EthicsPoint is a communications tool providing an avenue for sharing information of any kind. Whether reporting via the Web site or by phone, you will be asked if the situation you're reporting falls into any of the following 11 categories or "Issues": Accounting and Auditing; Conflict of Interest; Disclosure of Confidential Information; Discrimination or Harassment; Donor Stewardship; Falsification of Contracts, Reports or Records; Misconduct or Inappropriate Behavior; Safety; Theft; Violation of Policy, and Other. To help you select the appropriate "Issue", a definition is provided for each one.

Q. If I see a violation, shouldn't I just report it to my supervisor or human resources and let them deal with it?

You certainly can do that, but there are good reasons why you should use EthicsPoint as well. First, EthicsPoint ensures that your report gets to the appropriate people. Second, and more importantly, reports can be filed anonymously and all report information is secure and held in the strictest confidence.

Q. It is my understanding that any report I send from a company computer generates a server log that shows every Web-site to which my PC connects. If true, won't this log identify me as a report originator?

For productivity and logistical reasons, use of company-supplied resources (e.g., PC, phone, blackberry, etc.) may be routinely logged. However, EthicsPoint does not generate or maintain any internal connection logs with IP addresses, so no information linking your PC to EthicsPoint is available from EthicsPoint.



With fewer than 12% of reports generated during business hours according to statistics maintained by EthicsPoint, it appears from experience that most people prefer to report from the comfort of their home after hours and on the weekend, presumably using non-company resources. This adds an additional layer of security.

Q. Can I file a report from home and still remain anonymous?

A report from home, a neighbor's computer, or any Internet portal will remain secure and anonymous. An Internet portal never identifies a visitor by screen name and the EthicsPoint system strips away Internet addresses so that anonymity is totally maintained. Plus, EthicsPoint is contractually committed not to pursue a reporter's identity. For additional ease of mind, consider filing a report using resources that are not company-supplied (e.g., laptop connected to USTA Network, cell phone, blackberry).

Q. I am concerned that the information I provide EthicsPoint will ultimately reveal my identity. How can you assure me that will not happen?

The EthicsPoint system is designed to protect your anonymity. However, you as a reporting party need to ensure that the body of the report does not reveal your identity by accident, for example, "From my cube next to Jan Smith..." or "In my 33 years...."

Q. Isn't this just a "Big Brother" program making everyone suspicious of everyone else?

Absolutely not – the EthicsPoint system concentrates on being a positive aspect of the overall corporate culture, and allows employees to partner with management to assure a safe, secure and ethical workplace. We encourage you to use the system to seek guidance on ethical dilemmas, provide positive suggestions, or communicate a concern. Effective communication is the lifeblood of any organization and EthicsPoint is a great way to enhance that communication.

Q. I am aware of some individuals involved with unethical conduct, but it doesn't affect me. Why should I bother reporting it?

All unethical conduct, at any level, ultimately hurts the Organization and all employees and volunteers, including you. You only have to consider what happened in recent corporate scandals to see disastrous effects that a seemingly harmless lapse in ethics can

have on an otherwise healthy company. So if you know of any incidents of misconduct or ethical violations, consider it your duty to yourself and your coworkers to report it.

Q. I am not sure what I have observed or heard is a violation of company policy, or involve unethical conduct, but it just does not look right to me. What should I do?

File a report. EthicsPoint can help you prepare and file your report so it can be properly understood. We'd rather you reported a situation that turned out to be harmless than let possible unethical behavior go unchecked because you weren't sure.

Q. Where do these reports go? Who can access them?

The report that you submit does not go directly to anyone in the Organization, but only to EthicsPoint. The information you report is entered and kept by EthicsPoint directly on its internal servers to assure maximum security of that information. No paper copies of the report are sent to the Organization either, so there is no chance that your report will be seen by or circulated to other employees. Instead, only two individuals have been granted access to the EthicsPoint system to read the reports. They are one volunteer, the Chair of the Audit Committee of USTA's Board of Directors, and one senior staff person, the Ethics Officer (General Counsel of USTA). These two individuals will together coordinate what investigation and what actions, if any, will be undertaken based on your report. They will periodically report to the Board of Directors on this activity. While they may involve others in their investigation, both of these report recipients are aware that, to the extent possible as permitted by law, keeping your report in the utmost confidence is mandatory. Further, the EthicsPoint system is configured and controlled and its staff is trained and committed to ensure that no report is ever shared with implicated parties, their peers, or subordinates (see below).

Q. What if my boss or other managers are involved in a violation? Won't they get the report and start a cover-up?

No, that is why the EthicsPoint system will only provide reports to the persons referred to in the preceding question and answer. In addition, the EthicsPoint system and report distribution are designed so that no report is ever shared with implicated parties. If either of the persons mentioned above is implicated, the report is available only to the party who is not implicated. This will help to eliminate cover-ups by any implicated individual.



Q. What if I remember something important about the incident after I filed the report? Or what if the company has further questions for me concerning my report?

When you file a report at the EthicsPoint Web site or via a toll-free number, you receive a unique user name and are asked to choose a password. You can return (and are encouraged to return) to the EthicsPoint system again either by Internet or telephone and access the original report to answer questions that may be posed by a company representative and/or to add further information that will help resolve open issues.

We strongly suggest that you return to the site in the time specified to answer your company's questions that have been posted to the site. You and your company now have entered into an "anonymous dialogue" where situations are not only identified but can be resolved, no matter how complex.

Q. Are these follow-on reports as secure as the first one?

All EthicsPoint correspondences are held in the same strict confidence as the initial report, continuing under the umbrella of anonymity.

Q. What if I want to be identified with my report?

There is a section in the report for identifying yourself, if you wish.

Q. Can I still file a report if I don't have access to the Internet?

You can file an EthicsPoint report from any computer that can access the Internet. You can file from home. Many public locations, including the public library, have Internet computers. If you don't have access or are uncomfortable using a computer, you can call the EthicsPoint toll-free hotline, 1-866-654-6516, which is available 24 hours a day, 365 days a year.

Q. Is the telephone toll-free hot line also confidential and anonymous?

Yes. You will be asked to provide the same information that you would provide in an Internet-based report and an EthicsPoint interviewer will type your responses into the EthicsPoint Web site. These reports have the same security and confidentiality measures applied to them during delivery.

HOW TO FILE A REPORT

What to Report: Situations, events or actions by individuals or groups that you believe carry a negative impact on our Organization's well-being or are detrimental to morale, productivity, or personal safety should be reported. Frivolous or unfounded reports do not help foster a positive workplace and should not be submitted.

If you are uncertain if a situation violates our policy, is illegal or constitutes harassment or discrimination, please use EthicsPoint to obtain clarification. We would much rather have you ask than let potential problems go unchecked. However, EthicsPoint should not be used for immediate threats to life or property. These types of reports should be directed to 911.

How to File a Report: Reporting is as easy as 1-2-3.

- 1. Access EthicsPoint to report**
- 2. Complete a report**
- 3. Follow-up on your report**

EthicsPoint is carefully designed to maintain your confidentiality and anonymity at every step. Step-by-step instructions guide you to help ensure that you do not inadvertently compromise its safeguards.

Step 1: Access EthicsPoint to report: Use either of these two convenient channels of communication.

Public	Toll-Free Phone
From any computer having Internet access (home, public library, neighbor, etc.), go to www.ethicspoint.com and click on "File a Report".	Call your EthicsPoint toll-free hotline at 1-866-654-6516. A compliance specialist will assist you in entering your report into the EthicsPoint system.



Step 2: Complete a Report: Following the on-screen or compliance specialist's instructions please complete a report, being as thorough as you can.

1. Specify what kind of report you'd like to make from the available choices.
2. Please read or listen to the anonymity information very carefully. It helps to ensure that you do not compromise your identity during the reporting process.
3. You will now complete the report, providing information about the incident, including:
 - Who: persons engaged in the incident or behavior, including titles;
 - What: what specifically occurred;
 - Where: the location of the incident; and
 - When: the time and duration of the incident, whether it's continuing or not.
4. Next, you will be asked to create a password. Then the EthicsPoint system will generate an identification code called a "Report Key." Write them both down, and keep them in a safe place. You will need them to follow-up later, or if you ever want to review or amend your report.

Step 3: Follow-Up: Seven business days after you complete your report, please return to the EthicsPoint system to see if there are any follow-up questions or requests from us.

1. Reconnect with EthicsPoint using either the Internet or toll-free phone number.
2. This time click on (or ask to perform) a Follow-Up.
3. Provide your Report Key and Password.
4. You can now elect to review report details, respond to questions, and add information.
 - To review your report, just click "Review Report Details" or ask the compliance specialist.
 - You will be told if we have entered questions about your report. Answer the questions verbally or by typing in the question boxes and click "Submit".
 - You can add information to the report verbally or by using the "Submit New Information" box.

5. If you have agreed to participate in an Ethics Chat, click “Join a Chat” at the specified time. Type your comments into the field at the bottom of the window and click “Submit.”

An Ethics Chat is a real-time communication between you and a representative from one of the USTA family of companies to clarify details and answer questions. Like the rest of the EthicsPoint system, it is confidential and anonymous.

6. You may return regularly to review your report, answer questions, and add information.

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