

Whistleblower Policy for Wisconsin Tennis Association (WTA)

PURPOSE/COMMITMENT

It is the policy of the United States Tennis Association/WTA District to conduct its affairs with the utmost commitment to business excellence and the advancement of tennis development. Our organization is resolutely dedicated to upholding the highest standards of integrity, transparency, and ethical conduct. In furtherance of this commitment, the Whistleblower Policy is established to foster an environment where employees, volunteers, athletes, and all stakeholders are encouraged to promptly report any known or suspected violations of laws, regulations, policies, or ethical standards, with the assurance that they will be protected from any form of retaliation.

While the USTA/WTA District's existing policies identify specific individuals within the organization to whom instances of fraudulent activity and unethical behavior can be reported, we acknowledge that there may be occasions when individuals feel uneasy about directly approaching these designated contacts. To address this concern and to provide an additional layer of confidentiality, the USTA/WTA District has entered into an agreement with Navex, an independent service provider renowned for its expertise in secure and anonymous "Whistleblower/Hotline" services.

This partnership with Navex ensures that individuals who wish to make an anonymous report can do so with the utmost security and confidentiality. The goal is to create a safe space for reporting concerns, thereby fortifying our collective commitment to maintaining the integrity and ethical standards of the USTA/WTA District.

SCOPE

This policy applies to all individuals who are associated with WTA or USTA, including employees, volunteers, contractors, athletes, and board members. The Whistleblower Policy is designed to handle issues related to reporting actual or suspected violations of laws, regulations, policies, or ethical standards within or about the organization. It is important to note that this policy only applies to the actions of employees, volunteers, contractors, athletes, and board members concerning their specific roles within the WTA and USTA. It does not reflect on their actions outside of these positions. Additionally, this policy does not address disputes, conflicts, or grievances arising in league and tournament play. These kinds of issues are covered under the organization's existing Grievance Arbitration Policy.

The Grievance Arbitration Policy governs conflicts such as disputes between participants during league and tournament play, disagreements related to match outcomes, or interpersonal issues within the specific context of organized competitions. These situations are directly linked to league or tournament play and should be filed with the local league coordinator in the specific area.

The Whistleblower Policy, on the other hand, is intended for reporting broader concerns related to unethical behavior, illegal activities, or violations of organizational policies involving persons in their specific roles with WTA or USTA as an organization. It provides a confidential and protected avenue for individuals to report such concerns without fear of retaliation.

Both policies work in conjunction to ensure a comprehensive approach to addressing various concerns within WTA. Individuals are encouraged to familiarize themselves with both policies to understand the specific processes and procedures that apply to their respective situations.

For greater awareness and clarity or distinction between the two policies, review the real-life scenarios in Appendix A. Otherwise, continue to the next section on reporting mechanisms.

What Type of Misconduct Should Be Reported?

As noted above, the WTA organization wants to hear about such conduct that is unlawful, dishonest, or unethical as soon as possible and is committed to addressing it. Below are examples of the types of misconduct or behavior that could give rise to a report and related to a person's role with WTA or USTA; however, it is not an exhaustive list and WTA encourages all colleagues to report any behavior or incidents in which they have concerns. **Definitions are shown in Appendix B.**

- Ethical violations, criminal activity, or offenses, including abuse of position with a wide range of ethical breaches, such as organization misconduct or inappropriate behavior, conflict of interest, fraud, theft, money laundering, and embezzlement.
- Corruption, bribery, or blackmail.
- Financial malpractice, impropriety, or mismanagement.
- Facilitating tax evasion.
- Failure to comply with any legal or professional obligation or regulatory requirements.
- Conduct likely to damage WTA's reputation or financial well-being.
- Any form of abuse, harassment, or discrimination within the WTA organization, involving athletes, coaches, staff, or other stakeholders.
- Actions that endanger or may endanger the environment or pose a threat to human rights or may endanger the health and safety of WTA's personnel or the public.
- The deliberate provision of false information to public officers.
- A miscarriage of justice.
- Unauthorized disclosure of confidential information.
- The deliberate concealment of information relating to any of the above matters.
- Reports related to match-fixing, illegal gambling, or any attempts to manipulate the outcome of sporting events by employees or volunteers of the organization.
- Any breaches of WTA's rules, policies, or regulations of the organization and do not include issues related to the adult league or tournament grievance issues.
- It is prohibited to retaliate against someone for speaking up or "whistleblowing". Everyone must report any such misconduct or potential misconduct as it relates to the person's role with the WTA or USTA as soon as they become aware of it. If you are uncertain whether something is within the scope of this policy, any concerns should be reported rather than kept to oneself.
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Reporting Mechanisms

The services provided by Navex enable you to anonymously report a suspected violation of policy via the Navex phone service or Web site. Navex will make the information in your anonymous report available only to selected individuals within the Organization and it will be handled discreetly and confidentially.

NOTE: Navex is a place to house/store all your documentation for investigating any reports sent to you. Navex does not do the investigation on your behalf. It is the responsibility of each district to develop its internal procedure for how to handle cases and investigations. **Please refer to the district's investigation process outline.**

Employees and volunteers have **three ways** to report an incident via Navex:

1. Call the **Navex hotline: 866-654-6516** (The hotline is open 24/7)
2. Report via the **Navex Mobile link:** ustamidwest.navexone.com
3. Report via the Navex website: ustamidwestsection.navexone.com

NOTE: The hotline, mobile site, and website are the same for all districts. In case you get a case for another district, please notify Laura McLoughlin (laura.mcloughlin@midwest.usta.com) immediately.

Once an incident has been reported a case is then created within the Navex program. The administrator for your district will be notified via email of the opened case. Then, you will need to begin the investigative process.

Anyone who has a concern about an actual or suspected violation is encouraged to report it promptly. WTA District Navex administrators are:

- Pam Hammond (Pamhammond62@gmail.com)
- Jeffrey Dittman (Jeffreydittman@gmail.com)
- Joan Donner (Donnerj123@aol.com)

Confidentiality

Reports made under this policy will be treated with the utmost confidentiality to the extent permitted by law. WTA will make every effort to protect the identity of the whistleblower, and information will only be disclosed to individuals on a need-to-know basis. If the complaint involves a specific administrator of the whistleblower policy, the report will be directed to another administrator.

Non-Retaliation

WTA prohibits any form of retaliation against individuals who, in good faith, report violations or suspected violations of laws, regulations, policies, or ethical standards. Retaliation is a serious violation of this policy and will result in disciplinary action, up to and including termination.

Investigation Process

All reports will be promptly and thoroughly investigated. WTA will designate an appropriate party or committee to handle the investigation. The findings will be communicated to the appropriate parties, and corrective action will be taken as necessary. **Refer to the district's investigation process outline.**

False Reports

Knowingly making false accusations or providing false information is a violation of this policy and may result in disciplinary action, up to and including termination.

Documentation and Record Keeping

All reports and investigations will be documented and retained per applicable laws and regulations.

Policy Review

This policy will be periodically reviewed and updated to ensure its effectiveness and compliance with relevant laws and best practices.

Communication

This policy will be communicated to all individuals associated with WTA, and training on the whistleblower process will be provided as necessary. **FAQs are shown in Appendix C.**

By adhering to this Whistleblower Policy, the Wisconsin Tennis Association demonstrates its commitment to maintaining a culture of integrity and accountability.

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

1. Access Navex to report
2. Complete a report
3. Follow up on your report

Navex 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 Navex to report: Use either of these two convenient channels of communication.

Public Internet Toll-Free Phone Number

1. From any computer having Internet access, (home, public library, neighbor, etc.) go to ustamidwestsection.navexone.com and click on "File a Report".

Call your Navex toll-free hotline at 1-866-654-6516. A compliance specialist will assist you in entering your report into the Navex 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 anonymous 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 Navex 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 Navex system to see if there are any follow-up questions or requests from us.

1. Reconnect with Navex using either the Internet or a 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 EthicsChat is a real-time communication between you and a representative from one of the USTA/USTA District family of companies to clarify details and answer questions. Like the rest of the Navex system, it is confidential and anonymous.
6. You may return regularly to review your report, answer

APPENDIX A

Real-Life Scenarios (Whistleblower Policy **versus** Grievance Arbitration Policy - In these scenarios, the key distinction lies in the nature and scope of the issues:

WHISTLEBLOWER SCENARIOS	GRIEVANCE ARBITRATION SCENARIOS
An employee observes financial irregularities within the organization, suspecting embezzlement or fraud involving fellow employees or higher-ups. The employee is concerned about the potential impact on the organization's integrity and reputation. In this case, the whistleblower policy should be utilized to report financial misconduct, as it involves unethical behavior that goes beyond the scope of the grievance arbitration process, which typically addresses disputes related to league play, player conduct, or similar issues.	A player in the league files a complaint against the coach, alleging unfair treatment, discriminatory behavior, or a violation of the code of conduct during team practices and games. The player believes that their playing time and opportunities are being affected by the coach's actions. This scenario falls under the realm of the grievance arbitration policy, as it pertains to issues directly related to league play, player-coach relationships, and team dynamics.
A volunteer or staff member witnesses a pattern of systemic doping or cheating practices among athletes within the organization. The individual is concerned that this behavior may compromise the integrity of the entire sports program and potentially violate ethical and legal standards. Reporting such issues should be channeled through the whistleblower policy to address broader ethical concerns that extend beyond the specific interactions and behaviors covered by the grievance arbitration process.	Two athletes on the same team have a personal dispute that escalates and affects their on-field performance and team dynamics. The athletes may file a grievance related to their interpersonal conflict, requesting arbitration to resolve the issue and ensure fair treatment. This scenario is more aligned with the grievance arbitration process, as it deals with player-to-player conflicts within the context of league play.
An employee discovers evidence of sexual harassment or abuse within the organization involving staff or volunteers. The employee feels a moral obligation to report these serious violations, as they pose a significant risk to the well-being of individuals and could lead to legal consequences. The whistleblower policy should be used to report these issues, ensuring that the organization can investigate and address the misconduct appropriately.	A dispute arises between a player and the league management over a disciplinary decision, such as a suspension or fine, based on the player's on-field conduct. The player believes the punishment is unjust, and the grievance arbitration process would be invoked to resolve the dispute and ensure a fair assessment of the player's behavior within the context of league play.

APPENDIX B

DEFINITIONS

- **Ethical Violations:** Actions or behaviors that deviate from accepted ethical standards or principles.
- **Corruption:** Dishonest or fraudulent conduct, often involving abuse of power for personal gain.
- **Bribery:** Offering, giving, receiving, or soliciting something of value to influence the actions of an official or other person in a position of trust.
- **Blackmail:** Coercive threats, often involving the disclosure of sensitive information, to compel someone to act against their will.
- **Fraud:** Deceptive practices intended to gain an unfair or dishonest advantage, typically for financial gain.
- **Theft:** Unauthorized taking of someone else's property with the intent to permanently deprive them of it.
- **Conflict of Interest:** A situation in which a person or entity has competing interests, making it difficult to fulfill their duties objectively.
- **Money Laundering:** The process of concealing the origins of illegally obtained money, typically using transfers involving foreign banks or legitimate businesses.
- **Embezzlement:** The misappropriation or theft of funds entrusted to someone, typically an employee, for personal use.
- **Abuse of Position:** Exploiting one's authority or role for personal gain or to the detriment of others.
- **Criminal Activity:** Any illegal action that can result in criminal charges and prosecution.
- **Misconduct:** Unacceptable or improper behavior, often violating established rules, regulations, or standards. This does not include situations involving adult league or tournament grievance issues. These types of issues should be filed with the area's local league coordinator.
- **Inappropriate Behavior:** Actions that are considered unsuitable, offensive, or inconsistent with accepted norms and expectations of the organization and not league play.
- **Retaliation:** refers to the act of responding to a perceived wrong, injury, or harm with a corresponding action or measure, typically intended to inflict harm or punishment in return. It often involves seeking revenge or retribution in response to a prior action or offense. Retaliation can occur in various contexts, such as interpersonal conflicts, legal disputes, workplace situations, or international relations. It is characterized by a desire to get back at someone for a perceived injustice, often resulting in a cycle of negative actions and consequences.

APPENDIX C

Whistleblower Policy FAQs:

Questions and Answers about Navex and Reporting Suspected Misconduct Generally

Q. What is Navex?

Navex is a comprehensive, confidential, and anonymous Internet and telephone-based reporting tool that assists management, employees, and volunteers in working 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, Navex 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 Navex?

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 no-for-profit organizations like us.
3. Reporting "hotlines" has 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. 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/WTB District 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 ethically 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/WTB District, where loss of reputation in any of the USTA/WTB District family of companies can have serious consequences for all of them.

Q. What type of situations should I report?

Navex 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 Navex as well. First, Navex 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 Website to which my PC connects. If true, won't this log identify me as a report originator?

For productivity and logistical reasons, the use of company-supplied resources (e.g., PC, phone, tablet, etc.) may be routinely logged. However, Navex does not generate or maintain any internal connection logs with IP addresses, so no information linking your PC to Navex is available from Navex. With fewer than 12% of reports generated during business hours according to statistics maintained by Navex, 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 a layer of security.

Q. Can I file a report from home and 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 Navex system strips away Internet addresses so that anonymity is maintained. Plus, Navex 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/WTA District Network, cell phone, blackberry).

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

The Navex 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 Navex system concentrates on being a positive aspect of the overall corporate culture and allows employees to partner with management to ensure a safe, secure, and ethical workplace. We encourage you to use the system to seek guidance on ethical dilemmas, provide positive suggestions, or communicate concerns. Effective communication is the lifeblood of any organization and Navex 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 the 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 if what I have observed or heard is a violation of company policy, or involves unethical conduct, but it just does not look right to me. What should I do?

File a report. Navex can help you prepare and file your report so it can be properly understood. We'd rather you report 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 Navex. The information you report is entered and kept by Navex directly on its internal servers to ensure 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 Navex system to read the reports. They are one volunteer, the Chair of the Audit Committee of USTA/USTA District's Board of Directors. And one senior staff person, the Executive Director. 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 report recipients are aware that, to the extent possible as permitted by law, keeping your report in the utmost confidence is mandatory.

Further, the Navex 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 Navex system will only provide reports to the people referred to in the preceding question and answer. In addition, the Navex system and report distribution are designed so that no report is ever shared with implicated parties. If either of the people

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 Navex Web site or via a toll-free number, you receive a unique username and are asked to choose a password. You can return (and are encouraged to return) to the Navex 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 Navex 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 a Navex 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 Navex toll-free hotline, 1-866-297-4191, which is available 24 hours a day, 365 days a year.

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

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

Q. How to File a Report (see previous details)

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 Navex to obtain clarification. We would much rather have you ask than let potential problems go unchecked. However, Navex should not be used for immediate threats to life or property. These types of reports should be directed to 911.

End of document.

Management Committee Approval: 2/21/2024