



USPA Ethics and Compliance Reporting Policy

The United States Polo Association (USPA) requires governors, directors, officers, employees and volunteers to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. As representatives of the USPA and/or engaging in activities on behalf of the USPA, we must practice honesty and integrity in fulfilling our responsibilities and in complying with all applicable laws and regulations.

Reporting Responsibility – All governors, directors, officers, employees and volunteers have the duty to promptly report concerns about actual or suspected violations of the USPA’s code of conduct, suspected illegal acts, or ethical violations relating to the USPA’s operations. Reports should be made timely. For equal employment opportunity, harassment, and related retaliation concerns, USPA employees should utilize the reporting procedures set forth in the applicable personnel policies in the USPA Employee Handbook.

Reporting Mechanism - All reports of violations or suspected violations will be kept confidential to the extent possible and will be promptly reviewed. Reports can be made by hotline, telephone, written form, website, email, or in person. Reports can be made to the HR Department, the CEO, the USPA Chairman of the Board of Governors, or the USPA’s compliance representative. (Please see below for contact information.).

Handling of Reported Violations – Upon receipt of the reporting, the USPA representative will forward the information to the USPA’s compliance designee. Information provided regarding allegations will be reviewed and analyzed to determine if there is sufficient validation for moving forward. Additional information may be requested during this process. If warranted, the primary investigation of the allegations will begin. After the investigation is finalized, appropriate action will be taken. The USPA’s compliance designee will advise the Board Chairman and Board of Governors of any issues reported deemed sufficient for investigating and their final resolution. Some of these alleged violation reports may be related to accounting or alleged financial improprieties. If so, the USPA compliance designee will work with the USPA Audit Committee in those areas, and if deemed significant, may transfer responsibility to the Audit Committee. The results of any financially-related items handled through the Ethics and Compliance Policy deemed immaterial for Audit Committee action will be reported at least annually to the Audit Committee.

Non-Retaliation – The USPA will not tolerate retaliation against a person who reports a suspected violation. Retaliation includes, but is not limited to, harassment, blacklisting, demotion, termination, and cessation of services.



Contact Information for Reporting Suspected Violations

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Website: uspolo.org, Hotline section

Email: compliance@uspa-ethics.com

Phone: 561.815.3207, Leave message with sufficient information. Please state if we can contact you should we need further information.

USPA Contact Information:

USPA Representatives:

- Immediate Supervisor
- Human Resources – Bev Basist, email: bbasist@uspolo.org, phone: 561-339-3973, address: 12300 Southshore Blvd, # 218, Wellington, FL 33414
- CEO – Robert Puetz, email: Bob@uspolo.org, phone: 760-861-0477, address: 12300 Southshore Blvd, # 214, Wellington, FL 33414
- USPA Chairman of the Board – Stewart Armstrong, email: stewartarm@gmail.com, address: 12300 Southshore Blvd, # 218, Wellington, FL 33414

Compliance Officer: CFO – Susan Present, email: spresent@uspolo.org, phone: 561.815.3207, or 561.701.4437, address: 12300 Southshore Blvd, # 218, Wellington, FL 33414