

USA GOLF Federation, Inc.

Policy on Corporate Accountability

The purpose of this Policy on Corporate Accountability (the “**Policy**”) is to affirm the high standards of excellence, integrity, honesty and fairness that USA GOLF Federation, Inc. (the “**USA GOLF**”) expects from all of its board members, officers and employees (the “**Constituents**”). Constituents are expected to avoid conduct which could be considered illegal, unprofessional, immoral, or counterproductive to the best interests of USA GOLF. Each Constituent is expected to comply with this Policy. Failure to comply may result in disciplinary action, including termination. Constituents are also expected to oversee compliance with this Policy by those people whom they supervise. If you have any questions concerning this Policy, you should contact the Executive Director of USA GOLF or the Legal Counsel for USA GOLF.

All Constituents have a duty to help USA GOLF identify ethics and compliance issues and promptly report any potential misconduct or violation of this Policy. Each Constituent should immediately notify their supervisor with any concern that another Constituent is about to violate or has violated this Policy. If for any reason a Constituent is uncomfortable approaching their supervisor (for example, if the supervisor is the person that may be violating this Policy) or feels that the matter is not being adequately addressed, the Constituent should immediately bring the matter to the attention of the Executive Director of USA GOLF or the Legal Counsel for USA GOLF.

USA GOLF will take any report of any violation of this Policy very seriously. USA GOLF will investigate the report promptly and take any appropriate corrective action as it deems necessary under the circumstances. USA GOLF will make every effort to conduct an investigation as confidentially as possible but cannot guarantee complete confidentiality, particularly as it may be required to make certain disclosures in order to conduct a full and thorough investigation.

No disciplinary or other retaliatory action will be taken against any Constituent for reporting or participating in good faith in an investigation of a potential violation of this Policy. If a Constituent believes they have been subject to retaliation in violation of this policy, the Constituent should report such immediately to the Executive Director of USA GOLF or the Legal Counsel for USA GOLF. Any Constituent who engages in any retaliatory conduct in violation of this Policy will be subject to disciplinary action up to and including termination.