



ITF Policy

ITF WHISTLEBLOWING POLICY

1. Definition of terms for the purposes of this policy

In this policy, unless the context otherwise requires or stipulates:

- **"Good faith"** means brought honourably and respectfully in the public interest with honesty, fairness, truthfulness, candidness, without withholding information, and without bias, prejudice, malice, ill will, hostility, personal animosity, or a desire to harm others.
- **"Bad faith"** means brought with an ulterior motive (for example, motivated by ill will, hostility, malice, personal animosity, lack of fairness or impartiality, lack of total honesty such as withholding information). It includes serious carelessness, recklessness and intentional fault. It can be established by direct or circumstantial evidence.
- **"Board"** means the ITF Board of Directors.
- **"Directors"** means members of the ITF Board of Directors.
- **"Disciplinary Committee"** means the ITF body that is given the authority to review and/or investigate reports of serious wrongdoing under this policy, and make recommendations to the Board with respect to sanctions or measures to be taken in cases where it is concluded that there has been a serious wrongdoing.
- **"External whistleblowing"** means reporting wrongdoings in an organization publicly outside the organization (e.g., police, social media channels).
- **"Internal whistleblowing"** means reporting wrongdoings in an organisation within the organisation – some organisations have internal whistleblowing channels for this purpose.
- **"ITF"** means the International Taekwon-Do Federation.
- **"Malicious disclosure"** means disclosure of wrongdoings without reasonable or probable cause and/or with the intent to harass, annoy, or cause harm.
- **Members** means individual members of the ITF.
- **"Reasonable and probable cause"** means that the facts and circumstances that exist give rise to the reasonable belief serious wrongdoings are occurring, have occurred, or are likely to occur.
- **"Reasonable belief"** means a belief that is supported by facts, evidence, witnesses, recordings, documents and the like, rather than rumors, gossips, and hearsays.
- **"Serious wrongdoing"** means an activity that is illegal – a breach of the law or of some rule of regulation – or unethical. It covers, for example, but is not limited to, an individual's behaviour towards another, illegal collection of funds, how work is commissioned or individuals appointed.

- **“Whistleblower”** means a person who has made an allegation or reported a serious wrongdoing in accordance to the terms of this policy.
- **“Whistleblowing”** means calling attention to, and/or disclosing a serious wrongdoing in an organisation – public or private. The disclosure may be internal or external to the organisation.
- **“Staff”** means employees, contractors, volunteers, and any other persons who work or are a volunteer for the ITF (e.g., administration, organization of events or activities) at the local, national or international level.

2. Purposes

The purposes of this policy are to:

- Provide individual members of the ITF (hereafter “Members”) with clear and effective channels within the organisation to report serious wrongdoings involving illegal or unethical activity related to the governance, management, or administration of the ITF.
- Encourage good faith internal reporting of serious wrongdoings in the ITF and, as such, actively promote organisational accountability and good governance as well as openness and trust within the organisation.
- Help detect, if not prevent, serious wrongdoings within the ITF.
- Ensure that Members receive feedback on any action undertaken by the ITF as a result of their reporting of a serious wrongdoing.
- Ensure that Members are protected against reprisals or victimisation for having reported a serious wrongdoing in good faith.
- Give information about further options available for reporting a serious wrongdoing, if Members are dissatisfied with the response from the ITF, or if internal investigation is deemed inappropriate.
- Help Members determine when it is ethically appropriate or inappropriate to internally or externally—report actual, suspected or apparent wrongdoing in activities related to the governance, management, or administration of the ITF and how to proceed with reporting such matters in a way that is ethical.
- Provide Members with information about the potential issues and risks of reporting a serious wrongdoing and, as such, help them make informed decisions about whether or not to report a serious wrongdoing in the ITF.
- Allow the ITF to take action against Members who make allegations of serious wrongdoings in bad faith and/or publicly discloses confidential information when it is legally prohibited or ethically inappropriate and/or unwarranted for them to do so for the reporting of a wrongdoing.

3. Scope of this policy

The ITF ‘Whistleblowing’ Policy is intended to cover wrongdoing reports that involve allegations of illegal or unethical activity related to the governance, management, or administration of the ITF and that fall outside the scope of other ITF procedures (e.g., procedures in connection with the ITF Safeguarding and Child Protection Policy; the ITF Harassment Policy; the Disciplinary Committee).

Whistleblowers will be appointed protection when reporting serious wrongdoing via qualifying disclosures. Under this policy, a qualifying disclosure is one made in good faith by an individual member of the ITF who has reasonable and probable cause to believe that there is, has been, or will be serious wrongdoing involving illegal or unethical activity related to the governance, management, or administration of the ITF.

4. The ethics of whistleblowing

Most people would agree that calling out illegal and unethical activity is necessary for our society. If governments, corporations, and organisations were allowed to engage in whatever activity they wanted, punishing those who tried to stop objectionable actions, we would be living in an unjust and immoral society. In that sense, whistleblowing is – at its core – ethical.

However, whistleblowing also involves a breach of confidentiality and has the potential to cause serious harm to those targeted by whistleblowing (e.g., someone's reputation) if found unfounded. This harm cannot be easily offset or corrected. Consequently, one needs to be mindful of the fact that whistleblowing is not always the correct answer and that it should be used with caution, i.e., only after considering the seriousness of the actual or suspected misconduct or wrongdoing, whether it has substantially harm or is likely to substantially harm a person or organisation, and whether it is appropriate for informal resolution.

Here is a general guideline to whistleblowing:

4.1. Informal resolution

Normally, when Members believe that there may have been unethical or illegal wrongdoing by an individual involved in the governance, management, or administration of the ITF, they attempt to resolve the issue by bringing it to the attention of that individual, if an informal resolution appears appropriate. Such intervention is deemed ethically more appropriate than reporting when the wrongdoing does not appear to cause serious harm or appears to be primarily a lack of sensitivity, knowledge, or experience. This may include talking informally with the individual, obtaining objective information and, if possible and relevant, the assurance that the unethical or illegal activity will be discontinued and that harm, if any, will be corrected. Any action taken should be consistent with the privacy and confidentiality rights and limitations of the individuals and groups involved.

4.2. Reporting

If an apparent or actual wrongdoing has substantially harmed or is likely to substantially harm a person or organization and is not appropriate for informal resolution, or is not resolved properly in that fashion, Members can take further action appropriate to the situation. Such action might include internal or external whistleblowing.

Ethically, in any escalation, internal whistleblowing should have precedence over external whistleblowing because internal reporting mitigates against potentially damaging outreach to external stakeholders or bodies for matters than can instead be satisfactorily managed in-house with lesser to no reputational and/or financial harm. This means that, whenever possible, internal processes should be exhausted in the first instances before reporting a serious wrongdoing externally. A serious wrongdoing should be reported externally only after having tried speaking up internally with no result, or when there are no internal whistleblowing procedures in place or there are valid reasons to have little faith in the organisation's investigation or reporting procedures.

Whether the reporting of a serious wrongdoing is done internally or externally, it should always be done in the public interest, without any malicious intent, and in good faith,

i.e., honestly, truthfully, objectively, respectfully, candidly, and only when there is reasonable and probable cause to believe that there is, has been, or will be a serious wrongdoing involving illegal or unethical activity.

5. Your safety

The ITF Board of Directors (hereafter “Board”) is committed to the effective implementation of this policy and procedure. The aim of the procedure is to ensure that an appropriate process exists which, in response to any disclosure of serious wrongdoing or irregularity, supports the resolution of matters reported in a manner which is fair, expedient and discreet.

It is not necessary for Members to have definite proof that such an act is being, has been, or is likely to be, committed to report it. Members do, however, need to have *reasonable and probable cause*, that is, to be in possession of sufficient facts and circumstances as would lead a reasonable person to believe that such an act is being, has been, or is likely to be, committed. Even when done in good faith, an alleged serious wrongdoing should not be reported without gathering evidence and checking the facts. Rumours and hearsays do not constitute evidence and are not good enough to justify whistleblowing. It would be unethical to proceed without checking the facts and gathering enough evidence to establish reasonable and probable cause.

When Members report a serious wrongdoing in good faith in a way that is ethically responsible (for ethical guidance, see Section 4 of this policy), they have the right not to be dismissed, victimised, or subjected to any other detriment. This is the case, even were it to materialise that they were genuinely mistaken. The ITF will not tolerate any individual being subjected to a detriment as a result of their making a disclosure in good faith and in a way that is consistent with the ethical standards outlined in Section 4 of this policy.

The ITF wants to promote and encourage an open and honest environment in which any serious wrongdoing can be freely reported in a way that is ethically responsible and respectful of individual’s rights, including but not limited to, right to privacy, confidentiality, non-discrimination, fair treatment, due process, and justice.

6. Your confidentiality

With these assurances, the ITF hopes that Members will report serious wrongdoings openly and in good faith when they have reasonable and probable cause. However, the ITF recognises that there may be circumstances when they would prefer to speak to someone in confidence first. If this is the case, they must say so at the outset. If the Member does not wish to disclose their identity, this will not be done without their consent unless required by law. That said, they should understand that there may be times when the ITF will be unable to resolve a concern without revealing their identity (e.g., in court cases). In such cases, the ITF will discuss with the Member whether and how the matter can best proceed.

Members should also understand that it will be much more difficult for the ITF to look into the matter reported by them if they do not tell us who they are. Furthermore, the ITF will not be able to give them feedback on any action undertaken by the ITF as a result of their report.

Where the Member reporting a serious wrongdoing does not wish to come forward as a witness, the ITF retains the right to pursue the matter further but must also respect the

Member's right to confidentiality. However, in those cases, the ITF should explain to the Member that this may ultimately prevent the ITF from being able to proceed.

Anonymous reports of wrongdoing are less helpful than non-anonymous ones, but will be considered at the discretion of the ITF. In exercising this discretion, the ITF will take into account the following:

- The seriousness of the issues raised;
- The credibility of the report (i.e., the documentation and the evidence presented to establish reasonable and probable cause); and
- The likelihood of confirming the allegation from relevant and reliable sources.

7. Malicious disclosures

Members are expected to report any serious wrongdoing in good faith, i.e., honestly, truthfully, objectively, respectfully, and only when they have reasonable and probable cause to believe that there is, has been, or will be a serious wrongdoing involving illegal or unethical activity. If it is found that they have made an allegation or reported a serious wrongdoing in bad faith (i.e., without reasonable or probable cause and/or with the intent to harass, annoy, or cause harm), they will be subject to discipline through the ITF Disciplinary Committee.

There is a significant difference between a report of serious wrongdoing that is made in bad faith, and a report that is made in good faith but not proven in the course of the investigation. The protection given to whistleblowers under this policy applies only to Members who report serious wrongdoing in good faith.

8. Reporting a serious wrongdoing

Members should report a serious wrongdoing as soon as possible after gathering enough evidence to support their allegations of wrongdoing. This will make it easier to act and to enable any problems to be resolved or reported quickly.

Members can make their disclosure orally; however, written disclosures are preferable as these will make the process more efficient and effective.

In their disclosure, Members should:

- Describe the nature of the wrongdoing and how it constitutes a serious wrongdoing
- Identify the suspect(s) involved in the wrongdoing.
- Present the facts and/or evidence they have that could lead any reasonable person to believe that the suspect(s) have done, are doing, or will do something illegal or unethical.
- Provide any relevant context and background, including relevant dates, venues, names, etc.
- Explain why the situation should be a source of concern for the ITF.

Members should state that they are reporting a wrongdoing under the present whistleblowing policy and whether they wish their identity to be kept confidential. While the ITF will make every effort to deal with their case confidentially, depending on the circumstances of the case, this may not always be possible. Consequently, to help Members make an informed decision about whether or not to report a wrongdoing in strict confidentiality, the ITF will inform Members of the limits of confidentiality before they formally submit a report of wrongdoing.

The ITF will consider anonymous disclosures, but the ITF do not encourage them as anonymity often makes it difficult to properly investigate concerns, protect Members or give feedback on outcomes.

The procedures contained below in Section 9 should ensure that Members concerns can be addressed and dealt with internally. However, if Members believe that a disclosure of information should be made externally in the public interest, this should be soundly based and they should first seek independent and/or specialist advice.

9. Internal Reporting Process

9.1. Who to contact?

Where a report of serious wrongdoing concerns a member of the ITF Executive Board or Board of Directors, a member of a Standing Committee other than the Disciplinary Committee, or Staff, the Member should contact the Chair of the ITF Disciplinary Committee who will review it in accordance with the rules and procedures of the Committee for dealing with reports and complaints of unethical behaviour.¹

If appropriate, and as long as the Member consents, the Chair of the ITF Disciplinary Committee will arrange for appropriate follow-up action to be taken or provide information and/or advice regarding external reporting of the wrongdoing.

9.2. What happens after a wrongdoing is reported?

- The Chair of the ITF Disciplinary Committee will acknowledge the reception of a report of serious wrongdoing from a Member within five working days.
- The report will be investigated by the Chair of the ITF Disciplinary Committee or a Designate appointed by the Chair of the Committee.
- The Chair or Designate will arrange to meet the Member within 14 days unless there are exceptional circumstances, either via video conference, telephone or face to face (i.e., in person), to ask questions and/or clarifications regarding the report submitted by the Member.
- The Chair or Designate will arrange to meet the individual(s) suspected of serious wrongdoing to ascertain some facts, obtain objective information and, if possible and relevant, the assurance that the unethical or illegal activity will be discontinued and that harm, if any, will be corrected.
- The Chair or Designate may arrange at their discretion to meet other individuals to ascertain some facts or obtain additional information.
- Members who report a serious wrongdoing will be informed in writing of the action that will be taken to address the wrongdoing they have reported as soon as possible after the Disciplinary Committee has completed its investigation. Where action is not taken, they will be informed and given an explanation. The action taken in response to a disclosure will depend on the nature of the concern.
- Members who are the object of an allegation of serious wrongdoing following the report of a whistleblower will be informed in writing of the Chair's or Designate's decision as soon as possible after the Disciplinary Committee has completed its investigation.

¹ Where a report of serious wrongdoing concerns a member of the ITF Disciplinary Committee, the Member should contact the President of the ITF who will create an "ad hoc" panel to review the report in accordance with Section 9.3 of this policy.

Typically, the matters raised may result in one or more of the following:

- No action required
- Action being taken under another ITF policy or procedure
- An internal investigation under this policy
- A referral to the police or relevant statutory body in the country where the individuals suspected of serious wrongdoing reside
- A referral to ITF's external auditors
- An external and independent enquiry

Any ITF Member involved in the governance, management, or administration of the ITF receiving a report alleging a serious wrongdoing from a Member should encourage the Member making the allegation to follow proper reporting channels for such matters and, accordingly, contact the Chair of the ITF Disciplinary Committee.

9.3. What if a report of wrongdoing concerns a member of the ITF Disciplinary Committee?

Where a report of serious wrongdoing concerns a member of the ITF Disciplinary Committee, the Member should contact the President of the ITF who will form an "ad hoc" panel that will be given the mandate to consider the whistleblowing report.

- The Ad Hoc Panel will consist of three members who will be selected among the members of the ITF Standing Committees, excluding the members of the Disciplinary Committee and the members of any Standing Committee who also is a member of the Board of Directors. One member of the Panel will be designated as Chair by the President. Those selected will be deemed to have the expertise needed to review the report.
- The Ad Hoc Panel will take the steps that are necessary and appropriate to review the whistleblowing report, using the ITF Whistleblowing Policy as a reference to guide the review process.
- The Ad Hoc Panel's decision, including the rationale for its decision, and, if any, its recommendations will be communicated in writing to the President by the Chair of the Panel in a timely manner soon after the Panel has completed its review.
- The Ad Hoc Panel's decision, including the rationale for its decision, will be communicated in writing to the whistleblower and the individual(s) targeted by the whistleblowing report by the President following the reception of the report from the Chair of the Panel.

10. Reporting a serious wrongdoing externally

External reporting of wrongdoing (i.e., external whistleblowing) include, but is not limited to, disclosure to external bodies such as the Court of Arbitration for Sport (CAS) and the Whistleblowing International Network (WIN) as well as disclosure to the press, the media, leak platforms, or via social media.

People sometimes choose to report a wrongdoing externally instead of internally. This is more likely to happen if they have little faith in their organisation's investigation or reporting procedure, have tried speaking up internally with no result, or if there is no whistleblowing system in place.

Members have a legal right to report a wrongdoing externally, i.e., outside of the internal reporting channels provided by the ITF. However, they are strongly encouraged to exhaust the internal processes set out above in the first instances before reporting a

wrongdoing externally. If matters can be resolved internally before becoming public, the organisation and the individual(s) accused of wrongdoing in a whistleblowing report within an organisation can avoid reputational damage and other negative consequences that can prove substantially harmful to both the individual suspected of serious wrongdoing and the whistleblower.

For essentially the same reasons, Members who choose to report a wrongdoing externally rather than internally are strongly encouraged to consider making a disclosure to prescribed bodies such as the Court of Arbitration for Sport (CAS) and the Whistleblowing International Network (WIN) before blowing the whistle publicly to the press, the media, leak platforms, or via social media.

11. Whistleblowing: Understanding the risks

Most of the time, it would be in the whistleblower's best interest (at least in the short-term) to stay silent. Even with legal protections, they can experience retaliation and ostracization. Whether someone chooses to speak up when they see wrongdoing is a personal decision. Many whistleblowers are motivated by wanting to do the right thing. However, even though organisations are prohibited from seeking revenge after a Member has exposed wrongdoing, a whistleblower's future may still suffer. Low-level bullying is difficult to detect. Whistleblowers often stand alone, and friends or colleagues they thought they could trust might turn their back on them in order to protect their own reputation. All of these can put terrible stress on anyone, and the physical and emotional impact can be huge. Whistleblowers can easily feel isolated and powerless.

Even if an anonymous system is in place, those exposing wrongdoing still need courage and determination.

There are many potential negative consequences to whistleblowing. But many whistleblowers say that, in spite of the stress, they still believe they did the right thing by trying to bring about a positive change.

Whistleblowing is not easy, but for many people, the costs and consequences of ignoring illegal or unethical activity may be much higher than what they would face by making the issue public.

12. Approval and version control

This policy was approved by the Board of Directors on **23 June 2024**

Date	Description	Version
23.06.2024	Whistleblowing Policy	1