



# EUGENE FIGURE SKATING CLUB

## WHISTLEBLOWER POLICY

### **Expectation**

The Eugene Figure Skating Club (EFSC) expects directors and officers and agents to observe high ethical standards and to comply with all applicable laws and regulations.

### **Open Door Policy**

If any director, officer or agent has complaints, concerns or questions as to the ethics or legality of another director, officer or agent action, they are encouraged to raise such complaints or concerns with:

- For directors and officers, the relevant individual is the board chair
- For agents, the relevant individual is a board member

In the event a board member or officer is not comfortable raising the issue with the board chair, he/she should contact any other board member.

In the event none these options are reasonable, the director, officer or agent believes there may have been a legal transgression, he/she should contact an outside attorney.

Anyone filing a complaint must be acting in good faith and have reasonable grounds for believing the information disclosed indicated a violation. Individuals making baseless or malicious accusations will be disciplined.

### **Requirements of Investigation**

After a reasonable time of receiving a complaint, concern or question regarding compliance with a law, regulation or ethics requirement, the Board Chair shall open an investigation into the matter and pursue it to resolution. Should the Board Chair find that a law, regulation or ethics requirement has been violated, appropriate action should be taken.

### **Confidentiality**

To the degree possible, the names of the individuals reporting under this Whistleblower Policy shall be kept confidential.

### **Protection from Retaliatory Action**

Neither the organization nor its officers or agents may take any negative or other retaliatory action against any director, officer or agent who in good faith reports a

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violation of a law or regulatory requirement. An agent who retaliates against someone who has reported a violation in good faith is subject to discipline including, but not limited to, termination.

### **Accounting and Auditing Matters**

The Finance Committee of the Board of Directors shall address all reported concerns or complaints regarding corporate accounting practices, internal controls or auditing.

### **General Policy**

This general policy is not a contract and it may be rescinded or amended at any time by the organization. It is not intended to and does not create and legally enforceable rights whatsoever for anyone.