



**Policy Name:** Whistleblower Policy

**Policy Number:** WHB201907

**Adopted:** 01/15/2016

**Revised:** 12/05/2019

## **Policy:**

### **General**

Central Ohio Rowing Inc.'s Code of Ethics and Conduct ("Code") requires directors, officers, and coaches to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. As representatives of the Central Ohio Rowing Inc., we must practice honesty and integrity in fulfilling our responsibilities and comply with all applicable laws and regulations.

### **Reporting Responsibility**

It is the responsibility of all directors, officers, and coaches to comply with the Code and to report violations or suspected violations in accordance with the Whistleblower Policy.

### **No Retaliation**

No director, officer, or coach who in good faith reports a violation of the Code shall suffer harassment, retaliation or adverse employment consequence. An individual who retaliates against someone who has reported a violation in good faith is subject to discipline up to and including termination of employment. This Whistleblower Policy is intended to encourage and enable individuals and others to raise serious concerns within the Central Ohio Rowing Inc. prior to seeking resolution outside the Central Ohio Rowing Inc.

### **Reporting Violations**

The Code addresses the Central Ohio Rowing Inc.'s open door policy and suggests that individuals share their questions, concerns, suggestions, suspected fraud or complaints with someone who can address them properly. In most cases, the President of the Board of Directors is in the best position to address an area of concern. However, if you are not comfortable speaking with the President of the Board of Directors or you are not satisfied with the President of the Board of Directors' response, you are encouraged to speak with another member of the Executive Committee. All individuals are required to report suspected violations of the Code of Conduct to the Central Ohio Rowing Inc.'s Executive Committee, who have specific and exclusive responsibility to investigate all reported violations.

### **Investigation**

The Central Ohio Rowing Inc.'s Board is responsible for investigating and resolving all reported complaints and allegations concerning violations of the Code.

### **Extent of Policy**

The Board shall address all reported concerns or complaints regarding accounting practices, internal controls or auditing.



### **Acting in Good Faith**

Anyone filing a complaint concerning a violation or suspected violation of the Code must be acting in good faith and have reasonable grounds for believing the information disclosed indicates a violation of the Code. Any allegations that prove not to be substantiated and which prove to have been made maliciously or knowingly to be false will be viewed as a serious disciplinary offense.

### **Confidentiality**

Violations or suspected violations may be submitted on a confidential basis by the complainant or may be submitted anonymously. Reports of violations or suspected violations will be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation.

### **Handling of Reported Violations**

The Board will notify the sender and acknowledge receipt of the reported violation or suspected violation within five business days. All reports will be promptly investigated, and appropriate corrective action will be taken if warranted by the investigation.

Name: \_\_\_\_\_

Signature: \_\_\_\_\_

Date: \_\_\_\_\_