

FIN.05.01 Whistle Blower Policy**Intent**

This policy is intended to encourage Board members, staff, volunteers, and others to report suspected or actual occurrence(s) of illegal, unethical or inappropriate behaviors or practices by BTC staff or volunteers or Club volunteers, without retribution.

What to Report

While not an exhaustive list, the following are examples of when you are encouraged to report suspected violations:

- **Financial Misconduct:** This includes theft, fraud, embezzlement, misuse of funds, false financial statements, or violations of tax laws.
- **Misuse of Resources:** This includes improper use of assets, facilities, or supplies.
- **Safety Concerns:** This includes unsafe working conditions, environmental hazards, or violations of health and safety laws.
- **Discrimination or Harassment:** This includes discrimination or harassment based on race, religion, color, national origin, sex, sexual orientation, gender identity, disability, or age.
- **Conflicts of Interest:** This includes situations where personal interests conflict with the interests of the BTC
- **Breaches of Confidentiality:** This includes unauthorized disclosure of confidential information.
- **Violations of Law:** This includes any violation of applicable laws or regulations.

Policy

- The Whistleblower should promptly report the suspected or actual event to their supervisor who shall inform the CEO and Co-Chairs of the Finance & Risk Committee. If the Whistleblower does not have a supervisor, or would be uncomfortable or otherwise reluctant to report to their supervisor, then the Whistleblower may report the event to the CEO or the Co-Chairs of the Finance & Risk Committee. Should any of these individuals be the subject of the event then reporting to the Chair of the Board or the Chair of Governance is appropriate.
- The Whistleblower can report the event with their identity or anonymously. The identity of the Whistleblower, if known, shall remain confidential to those persons directly involved in applying this policy, unless the issue requires investigation by law enforcement, in which case their identity may be subject to subpoena.
- The Whistleblower shall receive no retaliation or retribution for a report that was provided in good faith and not done primarily with malice to damage another individual or the organization. Anyone who retaliates against the Whistleblower (who reported an event in good faith) will be subject to discipline which may include termination of the employee or volunteer relationship.
- A Whistleblower who makes a report that is not done in good faith is subject to discipline, which may include termination of employee or volunteer relationship or other legal means to protect the reputation of the organization, staff, Board directors, and volunteers.
- Crimes against person or property, such as assault, rape, burglary, etc., should immediately be reported to local law enforcement personnel. A report through the Whistleblower facility can also be lodged should the Whistleblower so choose.

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- Supervisors, managers and/or Board directors who receive the reports must act within five business days to investigate and/or resolve the issue. The Finance & Risk Committee must be notified that a Whistleblower report has been made; this notification may exclude the Whistleblower's name or other details if a Finance & Risk Committee member is involved in the reported event.
- The Whistleblower shall receive a report within five business days of the initial report, regarding the investigation, disposition or resolution of the issue, including an estimate of when the issue is expected to be resolved. The Whistleblower shall receive a report when the issue is resolved. If the Whistleblower is unsatisfied with the resolution, they may file another report with another BTC manager, Board Director, or BTC committee member. The Board will receive a summary report of all Whistleblower complaints as part of the Finance & Risk Committee's regular reporting.