

**CAPITAL AREA SPORTSMEN'S LEAGUE  
WHISTLEBLOWER POLICY**

**1. GENERAL OBJECTIVES**

Capital Area Sportsmen's League (the "Corporation") requires its directors, officers, employees (if any), volunteers, and agents to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. These persons are representatives of the Corporation and must practice honesty and integrity and must comply with all applicable laws and regulations in fulfilling their responsibilities.

This Whistleblower Policy establishes the procedure under which directors, officers, employees (if any), volunteers, and agents who learn of improper conduct with respect to the Corporation may report that improper conduct without risk of retaliation.

This Whistleblower Policy is intended to encourage and enable directors, officers, employees (if any), volunteers, and agents of the Corporation to inform the Corporation of Improper Conduct (as defined below) and permit the Corporation to address such Improper Conduct, before seeking resolution outside the Corporation.

**2. DEFINITIONS**

For purposes of this Policy, the following terms shall have these meanings.

- a. Improper Conduct means any action or activity by a director, officer, employee (if any), volunteer, or agent of the Corporation that is undertaken in the performance of the individual's official duties, or with the appearance or representation that it is undertaken in the performance of official duties, whether or not within the scope of those duties, and that:
  - i. violates or gives the appearance of violation of any federal, state, or local law or regulation;
  - ii. is a misuse or misappropriation of the Corporation's property;
  - iii. is a willful failure to perform a duty, or an intentional violation of the Corporation's policies, procedures, rules, or regulations;
  - iv. is economically wasteful, involves gross misconduct, incompetence, or inefficiency, or potentially exposes the Corporation to liability for financial irregularities;
  - v. is a significant threat to the health or safety of the directors, officers, employees (if any), volunteers, or agents of the Corporation;
  - vi. is an unauthorized invasion, alteration, destruction, or manipulation of records and/or computer files;

- vii. pursues benefits or advantages that violate the Corporation's Conflict of Interest Policy; or
  - viii. interference with the Corporation's investigation conducted in accordance with this Policy, including any attempt to intimidate or retaliate against Whistleblowers or witnesses.
- b. Whistleblower means a person that reports Improper Conduct to the Corporation. The Whistleblower is not a fact finder, investigator, or person who makes any determination regarding corrective action or remediation of Improper Conduct.

### **3. REPORTING RESPONSIBILITY**

No director, officer, employee (if any), volunteer, and agent of the Corporation shall engage in Improper Conduct. Each such person shall report any Improper Conduct in accordance with this Whistleblower Policy.

### **4. NO RETALIATION**

No Whistleblower who in good faith reports Improper Conduct shall be harassed, retaliated against, or suffer adverse employment consequence. An employee (if any) or agent of the Corporation who retaliates against a person who in good faith reports Improper Conduct is subject to discipline up to and including termination of employment or agency.

### **5. REPORTING VIOLATIONS**

The Corporation has an open door policy. Any Improper Conduct shall be reported to any member of the Board of Directors, which has specific and exclusive responsibility to investigate all reported violations.

The Board of Directors may, but is not obligated to, designate a Compliance Officer to investigate Improper Conduct. If the Board of Director designates a Compliance Officer, each director, officer, employee (if any), volunteer, or agent should report Improper Conduct directly to the Compliance Officer.

### **6. HANDLING OF REPORTED VIOLATIONS**

If a Compliance Officer has been appointed, the Compliance Officer shall make a preliminary inquiry regarding the alleged Improper Conduct, and shall report his or her findings to the Board of Directors. If no Compliance Officer has been appointed, any member of the Board of Directors who has received a report of Improper Conduct shall report the Improper Conduct to the remaining members of the Board of Directors. All reports shall be promptly investigated and appropriate corrective action taken if warranted by the investigation.

**7. ACCOUNTING AND AUDITING MATTERS**

The Compliance Officer or Board of Directors shall immediately notify the Treasurer of any complaint and work with the Treasurer regarding the theft or conversion of the Corporation's assets, the Corporation's accounting practices, internal controls, or auditing. The Treasurer shall address all reported concerns or complaints regarding corporate accounting practices, internal controls or auditing.

**8. 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.

**9. SANCTIONS FOR FALSE CLAIMS OR TESTIMONY**

Any Whistleblower must act in good faith and have reasonable grounds for believing the reported actions constitute Improper Conduct. A Whistleblower who makes a claim under this Policy in bad faith, or knows or has reason to know that such claim is false or materially inaccurate, shall be subject to disciplinary sanctions. In appropriate cases, the Corporation may assess the costs of conducting the investigation against the Whistleblower.

An investigation participant who knowingly provides false or materially inaccurate information in the course of an investigation shall also be subject to disciplinary sanctions.