

Employee Protection (Whistleblower) Policy

General:

As employees and representatives of the Boys & Girls Clubs of Elko, we must practice honesty and integrity in fulfilling our responsibilities and complying with all applicable laws and regulations.

Reporting Responsibility & Procedures:

If any director, officer or employee reasonably believes that some policy, practice or activity of the Boys & Girls Clubs of Elko is in violation of law, a written complaint or e-mail must be filed with the board designated Compliance Officer or the Board president. At minimum, the following information should be provided in any report:

- Description of the nature of the improper activity.
- Name(s) of the employee(s) engaging in the activity.
- Approximate or actual date(s) the activity took place.

Reports may be submitted anonymously. Any report received in this manner will receive the same level of attention as that afforded to any other report where the sender is identified.

Within thirty days of receipt of any reported information, the Compliance Officer will complete a preliminary investigation to establish the validity of the reported activities. The Compliance Officer will document and maintain secured records of all reported activities and any documentation relating to the investigation of those activities. The Compliance Officer will maintain and all information they may receive or become party to in strict confidence.

Upon completion of the preliminary investigation, the Compliance Officer will forward the report and the findings of the investigation to the full Board for their review. The Compliance Officer will provide the full Board with the following:

- A copy of the original information provided by the whistleblower
- A report on the findings of the preliminary investigation, including the Compliance Officer's opinion of the reported activity.

Nothing in this document will preclude the Compliance Officer from notifying the full Board immediately of reported wrong-doing. The timing of the report will be dictated by the Compliance Officer's perception of the materiality or seriousness of the reported activity.

The full Board will review the Compliance Officer's findings on the reported activity as it is received, and will determine what, if any, further action is required. Action may include, but not be limited to requesting additional investigative work by the Compliance Officer, questioning senior management, contacting legal counsel, and/or reporting to law enforcement agencies.

No Retaliation:

It is the intent of the Boys & Girls Clubs of Elko to adhere to all laws and regulations that apply to the organization and the underlying purpose of this policy is to support the organization's goal of legal compliance. The support of all employees is necessary to achieving compliance with various laws and regulations. An employee is protected from retaliation only if the employee brings the alleged unlawful activity, policy or practice to the attention of the Boys & Girls Clubs of Elko and provides the Boys & Girls Clubs of Elko with a reasonable opportunity to investigate and correct the alleged unlawful activity. The protection described below is only available to employees that comply with this requirement. Boys & Girls Clubs of Elko will not retaliate against an employee who in good faith, has made a protest or raised a complaint against some practice of the Boys & Girls Clubs of Elko, or of another individual or entity with which the Boys & Girls Clubs of Elko has a business relationship, on the basis of a reasonable belief that the practice is in violation of law, or a clear mandate of public policy. The Boys & Girls Clubs of Elko will not retaliate against employees who disclose or threaten to disclose to a supervisor or public body, any activity, policy or practice of the Boys & Girls Clubs of Elko that the employee believes is in violation of a law, or a rule, or regulation mandated pursuant to law or is in violation of a clear mandate or public policy concerning the health, safety, welfare, or protection of the environment.

If any employee believes that he or she has been retaliated against, he or she should immediately contact the Compliance Officer who will then investigate the alleged retaliation. If the investigation confirms that the employee was retaliated against because of his/her reports, the Board of Directors will take appropriate corrective actions.

Compliance Officer:

The Compliance Officer is responsible for investigating and resolving all reported complaints and allegations and, at their discretion, shall advise senior management and/or the Audit Committee of the Board of Directors. The Compliance Officer has direct access to the Audit Committee and is required to report to the Audit Committee at least annually on compliance activity. The Compliance Officer serves as the Chair of the Audit Committee.

Auditing and Accounting Matters:

The Audit Committee of the Board of Directors shall address all reported concerns or complaints regarding corporate accounting practices, internal controls or auditing. The Compliance Officer shall immediately notify the Audit Committee of any such complaint and work with the committee until the matter is resolved.

Acting in Good Faith:

Anyone filing a complaint concerning a violation or suspected violation must be acting in good faith and have reasonable grounds for believing that information disclosed indicates a violation. 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 Compliance Officer 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 investigation.