

WHISTLEBLOWER POLICY
OF
FLAGSTAFF SKI CLUB, INC.

ARTICLE 1 INTRODUCTION AND PURPOSE

FLAGSTAFF SKI CLUB, INC. (FSC) requires its directors, officers, employees and volunteers to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. The purpose of this policy is to encourage and enable employees and volunteers of FSC to report any action or suspected action taken within FSC that is illegal, fraudulent or in violation of any adopted policy of FSC, to a source within FSC before turning to outside parties for resolution. This policy applies to any matter which is related to FSC's business and does not relate to private acts of an individual not connected to the business of FSC. This policy is intended to supplement any applicable state and federal laws governing whistleblowing applicable to nonprofit and charitable organizations.

ARTICLE 2 VIOLATIONS; REPORTING IN GOOD FAITH

All employees and volunteers of FSC are encouraged to report any action or suspected action taken within FSC that is illegal, fraudulent or in violation of any adopted policy of FSC (each, a "Violation"). Anyone reporting a Violation must act in good faith, without malice to FSC or any individual in FSC, and have reasonable grounds for believing that the information shared in the report indicates that a Violation has occurred. *[Any report which the complainant has made maliciously or any report which the complainant has good reason to believe is false will be viewed as a serious disciplinary offense.]*

ARTICLE 3 NO RETALIATION

No employee or volunteer who in good faith reports a Violation or cooperates in the investigation of a Violation shall suffer harassment, retaliation or adverse employment or volunteer consequences. Any individual within FSC who retaliates against another individual who in good faith has reported a Violation or has cooperated in the investigation of a Violation is subject to discipline, including termination of employment or volunteer status.

If an individual believes that someone who has made a report of a Violation or who has cooperated in the investigation of a Violation is suffering from harassment, retaliation or other adverse employment or volunteer consequences, the individual should contact the President of the Board of Directors, or the Executive Board.

Any individual who reasonably believes he or she has been retaliated against in violation of this policy shall follow the same procedures as for filing a complaint (outlined in Article 4 below).

ARTICLE 4 REPORTING PROCESS

If an individual reasonably believes that a Violation has occurred, the individual is encouraged to share his or her questions, concerns, suggestions or complaints with any person within FSC who may be able to address them properly.

In most cases, the direct supervisor of an individual is the person best suited to address a concern. However, if an individual is not comfortable speaking with his or her supervisor or if he or she is not satisfied with the supervisor's response, the individual is encouraged to speak directly to the President of the Board of Directors, the Executive Board, or anyone in management he or she feels comfortable approaching.

ARTICLE 5 CONFIDENTIALITY

FSC encourages anyone reporting a Violation to identify himself or herself when making a report in order to facilitate the investigation of the Violation. However, reports may be submitted on a confidential basis by the complainant or may be submitted anonymously to the President of the Board or the Executive Board. Reports of Violations or suspected Violations will be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation, to comply with all applicable laws, and to cooperate with law enforcement authorities. Furthermore, FSC will explore anonymous allegations to the extent possible, but will weigh the prudence of continuing such investigations against the likelihood of confirming the alleged facts or circumstances from attributable sources.

ARTICLE 6 HANDLING REPORTED VIOLATIONS

The supervisor, manager or board member who receives a report of a Violation from the complainant is required to notify the President of the Board of that report, except as provided below with respect to a report relating to the President of the Board. The President of the Board will notify the complainant and acknowledge receipt of a report of Violation within five business days, but only to the extent that the complainant's identity is disclosed or a return address is provided.

The President of the Board, or his or her designee, is responsible for promptly investigating all reported Violations and for causing appropriate corrective action to be taken if warranted by the investigation. The complainant will be notified about what actions will be taken, to the extent reasonably possible and consistent with any privacy or confidentiality limitations. If no further action or investigation is to follow, an explanation for the decision will be given to the complainant.

In the event the President of the Board is suspected of having committed a Violation, then the Violation will be reported to the Executive Board, excluding the President, and the Violation will be investigated by Vice President under close supervision of the Executive Board.

ARTICLE 7 ACCOUNTING AND AUDITING MATTERS; REPORTS

The Treasurer is responsible for addressing all reported concerns or complaints of Violations relating to corporate accounting practices, internal controls or auditing. Therefore, the President of the Board must immediately notify the Treasurer of any such concern or complaint.

In addition, the President of the Board will advise the Executive Board and/or the Treasurer of any other reported Violations, the current status of the investigation, and the outcome or corrective action taken at the conclusion of the investigation.

* * *

Adopted by the Board of Directors at its Meeting on _____.

* * *

My signature below indicates my receipt and understanding of this policy. I also verify that I have been provided with the opportunity to ask questions about the policy.

Date: _____

Name: _____

FORM OF WHISTLEBLOWER POLICY FOR A
CALIFORNIA PUBLIC BENEFIT NONPROFIT CORPORATION

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APPENDIX A: WHISTLEBLOWER REPORTING FORM

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**FLAGSTAFF SKI CLUB, INC.
WHISTLEBLOWER REPORTING FORM**

The purpose of this form is to provide a mechanism to encourage reporting of any action or suspected action taken within **FLAGSTAFF SKI CLUB, INC. (FSC)** that is illegal, fraudulent, unethical or in violation of any adopted policy of FSC in a safe environment. Anyone reporting a violation must act in good faith, without malice to FSC or any individual, and have reasonable grounds for believing that a violation occurred. *[Any report that the complainant has made maliciously or any report that the complainant has good reason to believe is false will be viewed as a serious disciplinary offense.]*

NO ONE WHO IN GOOD FAITH MAKES A REPORT OR COOPERATES IN THE INVESTIGATION OF A VIOLATION SHALL SUFFER HARASSMENT, RETALIATION, OR ADVERSE EMPLOYMENT CONSEQUENCES.

➤ Is this the first time you are filing a report for the improper conduct?

_____ Yes

_____ No, please state the date(s) or approximate date(s) of your previous report(s).

Name of Person Filing Report*

*You are not required to provide your name and may retain anonymity. If you choose to provide your name, it will remain confidential whenever possible. Providing your name may facilitate the investigation of the misconduct. Anyone filing an anonymous report will not be updated as to the progress of the investigation, but do understand that investigations are taken seriously and will be addressed. Making a complaint does not automatically shield you from consequences of your own involvement in unlawful or improper conduct. However, full and frank admissions may be considered in deciding disciplinary actions.

_____ Name

_____ Date

Name of Person(s) Subject to this Complaint

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Name	Relation/Position**

***If this person is not an employee of FSC, please list his or her position or relationship to FSC (e. g. , Board Member, Volunteer).*

Complaint Report

Please include as much detail as possible to enable a thorough investigation of the matter. Please go beyond the question prompts and the lines provided if necessary to adequately describe the matter.

What act occurred and how do you believe it was fraudulent, illegal, or inappropriate?
If applicable - please describe the nature of any injury or damage sustained.

When and where did the misconduct occur?
(Please indicate if the actions were committed over a period of time)

What do you believe enabled the act(s) to occur? E.g.,: a lack of controls, circumvention of controls, or collusion with other individuals? Are you aware of any motives for the misconduct?

Does the misconduct involve the participation of people external to FSC?

Are there any witnesses that can confirm the misconduct?

EVIDENCE: Please attach a copy or original of any supporting documents or other evidence in your possession, if any. **DO NOT ATTEMPT TO OBTAIN** more evidence. You are a reporting party and not an investigator of the misconduct.
