	Rugby Ohio	Policy # Revision # Supersedes	317 00 Policy-317 Rev 00
Page 1 of 3	<i>Whistleblower</i>	Eff Date	2014, April 21
Policy Owner	Administration	Approval	Board

1. Purpose

Rugby Ohio requires board members, officers, committee members, employees, affiliates, and volunteers to observe high standards of business and personal ethics in the conduct of their duties and responsibilities and to comply with all applicable laws and regulatory requirements.

2. Scope

This policy covers all Rugby Ohio officers, directors, employees, members, volunteers, players, coaches, associates, and any other personnel interacting with Rugby Ohio in any manner.

3. Definitions

None

4. Prerequisites

None

5. Responsible Person(s)


Board of Directors – Responsible for authorization.

Executive Director – Responsible for development and implementation of the policy.

6. References

None

7. Policy

	Rugby Ohio	Policy # Revision # Supersedes	317 00 Policy-317 Rev 00
Page 2 of 3	Whistleblower	Eff Date	2014, April 21
Policy Owner	Administration	Approval	Board

Reporting Responsibility.

Rugby Ohio seeks to have an "Open Door Policy" and encourages officers, directors, employees, members, volunteers, players, coaches, and associates to share their questions, concerns, suggestions, or complaints regarding Rugby Ohio and its operations with someone who can address them properly. In most cases, the Executive Director is generally in the best position to address an area of concern. However, if a person is not comfortable speaking with the Executive Director or if the person is not satisfied with the Executive Director's response, the person is encouraged to speak with anyone on the Board whom the employee or volunteer is comfortable in approaching, or to directly contact Rugby Ohio's outside legal counsel, whose contact information can be obtained from the Executive Director.

No Retaliation.

No person who in good faith reports a violation of a law or regulation requirement shall suffer harassment, retaliation, or adverse employment or participation consequence. Retaliation against someone who has reported a violation in good faith is subject to discipline up to and including termination of employment or service. This Whistleblower Policy is intended to encourage and enable persons to raise serious concerns within Rugby Ohio prior to seeking resolution outside Rugby Ohio.

Compliance Officer.


Rugby Ohio's Executive Director, working with the Chair of the Board, will act as Rugby Ohio's Compliance Officer. The Compliance Officer is responsible for investigating and resolving all complaints and allegations concerning violations of the Policies and/or Law. The Board Chair or his or her designee will take on the Compliance Officer role if the complaint involves the Executive Director and vice versa. If the complaint involves both the Executive Director and Board Chair, outside legal counsel or another board member will carry out the functions of the Compliance Officer.

Accounting and Auditing Matters.

The Financial Oversight 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 Financial Oversight Committee of any such complaint and work with the Committee until the matter is resolved.

Requirement of Good Faith.

Anyone filing a complaint concerning a violation or suspected violation of the law, regulatory,

	Rugby Ohio	Policy # Revision # Supersedes	317 00 Policy-317 Rev 00
Page 3 of 3	<i>Whistleblower</i>	Eff Date	2014, April 21
Policy Owner	Administration	Approval	Board

reporting, or other policy must be acting in good faith and have reasonable grounds for believing the 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, or the person responsible for carrying out the Compliance acknowledge receipt of the reported violation or suspected violation by writing a letter (or e-mail) to the complainant within five business days. All reports will be promptly investigated and appropriate corrective action will be taken if warranted by the investigation.