## **Randolph Mountain Club Whistleblower Policy**

Purpose: This Whistleblower Policy aims to establish procedures for reporting and addressing concerns regarding illegal activities, unethical behavior, or other wrongdoing within the Randolph Mountain Club. The Randolph Mountain Club is committed to promoting transparency, accountability, and the highest standards of ethical conduct.

Scope: This policy applies to all directors, officers, employees, volunteers, contractors, and other individuals associated with the Randolph Mountain Club. It covers concerns about financial impropriety, fraud, violations of laws or regulations, conflicts of interest, harassment, discrimination, or any other misconduct that may negatively impact the organization.

Reporting Mechanism:

- 1. Anyone aware of a potential violation or wrongdoing is encouraged to report their concerns promptly and in good faith. They should submit a written report via email or in a sealed envelope labeled "Confidential" to the President or any other officer.
- 2. Confidentiality and Non-Retaliation:
- a) The Randolph Mountain Club is committed to protecting the whistleblower's confidentiality to the fullest extent possible, consistent with applicable law and the need to conduct an adequate investigation. However, anonymity cannot be guaranteed in cases where identification is required by law or necessary for a thorough investigation.
- b) The Randolph Mountain Club prohibits any form of retaliation against individuals who make good-faith reports. Retaliation includes, but is not limited to, termination, demotion, suspension, harassment, or any other adverse employment action. Any individual found to have engaged in retaliation will be subject to disciplinary action, up to and including termination.

Investigation and Review:

- 1. Upon receiving a whistleblower report, the recipient initiates an investigation. Any officer, board member, or employee who is potentially involved in the challenged conduct will recuse themselves from a role in the investigation of the report or decisions regarding consequences.
- 2. If necessary, an independent investigator may be appointed to ensure objectivity;
- 3. The investigation will be conducted carefully, and all parties involved will be afforded appropriate rights and protections. The whistleblower will be informed about the progress and outcome of the investigation to the extent reasonably possible.
- 4. If the investigation confirms a violation or wrongdoing, the Randolph Mountain Club will take appropriate remedial action, including disciplinary measures, referral to law enforcement, restitution, or any other necessary action.

Record Keeping: The Randolph Mountain Club will record all whistleblower reports received, investigations conducted, and actions taken in response to such reports. These records will be securely stored and kept confidential, as appropriate.

Policy Review: This Whistleblower Policy will be periodically reviewed to ensure its effectiveness and compliance with applicable laws and regulations. The Board will make any necessary updates or revisions.

Distribution and Training: This policy will be posted on the Randolph Mountain Club's website, and its employees and volunteers will be encouraged to familiarize themselves with its contents. Questions or concerns regarding this policy can be directed to the President.