

Document #: NSSAADM205	Title: WHISTLEBLOWER POLICY	Print Date: 9/25/2018
Revision #: 0.0	Prepared By: S. SCALES	Date Prepared: 9/25/2018
Effective Date: 9/28/2018	Reviewed By: EXECUTIVE COMMITTEE	Date Reviewed: 9/28/2018
Next Review: NLT 11/30/2020	Approved By: EXECUTIVE COMMITTEE	Date Approved: 9/28/2018

Policy: The National Skeet Shooting Association, a Texas 501 (c)(3) Corporation, which includes the NSSA, NSCA, and NSC Divisions (hereinafter, **THE CORPORATION**) requires Directors, Officers and Employees and Other Representatives of the Corporation to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. As employees and representatives of **THE CORPORATION**, we must practice honesty and integrity in fulfilling our responsibilities and comply with all applicable laws and regulations. In keeping with the policy of maintaining the highest standards of conduct and ethics, **THE CORPORATION** will investigate any suspected fraudulent or dishonest use or misuse of **THE CORPORATION** 's resources or property by Staff, Officers, Board Members, NSSA/NSCA Committee Members, or Volunteers which appears credible.

Purpose: The purpose of this policy is to protect “whistleblowers” who report a fraudulent or dishonest act perpetrated against and/or having deleterious effect on **THE CORPORATION** from retaliation for reporting such fraudulent or dishonest act. However, “whistleblowers” who are deemed to be a participant in such acts or admit being a participant in such acts shall not be protected from retaliation for their participation in such acts.

Scope: “Whistleblowers” are Employees, Officers, Board Members, NSSA/NSCA Committee Members, and Volunteers who, having witnessed or having gathered evidence of misconduct that can be best described as a deliberate act or failure to act with the intention of obtaining an unauthorized benefit, report such conduct to the appropriate authorities (defined below). A list of examples of such misconduct includes but is not limited to:

- Misappropriation or misuse of **THE CORPORATION**’s resources, including but not limited to its funds, investments, physical assets, supplies, and intellectual property.
- Unauthorized alteration, manipulation, or destruction of computer files
- Benefitting, individually from a violation of **THE CORPORATION**’s conflict-of-interest policy.

-
- Receiving compensation for goods/services neither received nor performed
 - Paying for goods/services that have neither been delivered nor rendered.
 - Forgery or alteration of documents.
 - Authorizing or receiving compensation for hours not worked
 - Supplying false or misleading information on **THE CORPORATION** 's financial or other public documents.
 - Providing false information to or withholding material information from **THE CORPORATION** 's Board of Directors or auditors
 - Altering, concealing, covering up, falsifying, mutilating or destroying any records that may be connected to an official proceeding, in violation of federal or state law or regulations or otherwise obstructing, influencing, or impeding any official proceeding, in violation of federal or state law or regulations
 - Embezzling, self-dealing, or otherwise obtaining an unlawful personal benefit (i.e., **THE CORPORATION**'s assets and/or intellectual property being used by anyone in the organization improperly for personal gain).

Responsibility: All such misconduct must be reported to either the Executive Director or the President of the Board of Directors of **THE CORPORATION**, unless either the Executive Director or President of the Board of Directors is believed to be involved in such misconduct, in which case the misconduct must be reported to the Chair of **THE CORPORATION**'s Audit Committee. Reasonable care should be taken in dealing with suspected misconduct to avoid:

- Baseless allegations
- Premature notice to persons suspected of misconduct and/or disclosure of suspected misconduct to others not involved with the investigation
- Violations of a person's rights under law

Investigation: All relevant matters, including suspected but unproved matters, will be reviewed and analyzed by a committee designated by President of the Board of Directors or by the Chair of the Audit Committee (in those instances where the President and/or the Executive Director may be the subject(s) of said investigation).

This may include an investigation by legal counsel and/or an accountant in some instances. All investigations will be kept confidential to the extent feasible. Appropriate corrective action will be taken, if necessary, and findings will be communicated for the person who reported the misconduct.

Protection: **THE CORPORATION** will use its best efforts to protect “whistleblowers” against retaliation. Whistleblowing complaints will be handled with sensitivity, discretion, and confidentiality to the extent allowed by the circumstances and the law. Generally, this means that “whistleblower” complaints will only be shared with those who have a need to know so that **THE CORPORATION** can conduct an effective investigation, determine what action to take based on the results of any such investigation, and in appropriate cases, with law enforcement personnel. Should disciplinary or legal action be taken against (a) person(s) because of a “whistleblower” complaint, such persons may also have the right to know the identity of the “whistleblower”.

Neither Employees, Officers, Board Members, Committee Members, nor Volunteers of **THE CORPORATION** may retaliate against a “whistleblower” for informing management about an activity which that person believes in good faith to be fraudulent or dishonest with the intent or effect of adversely affecting the terms or conditions of the “whistleblower's” employment, including but not limited to loss of job, punitive work assignments, impact on salary or wages, or threats of physical harm. “Whistleblowers” who believe that they have been retaliated against may file a written complaint with the President of the Board of Directors or the Chair of **THE CORPORATION's** Audit Committee (when the President of the Board of Directors is the one alleged to have retaliated against the “Whistleblower”). Any complaint of retaliation will be investigated, promptly, and appropriate corrective measures taken if allegations of retaliation are substantiated. This protection from retaliation is not intended to prohibit supervisors from taking action, including disciplinary action, in the usual scope of their duties including action based on valid performance-related factors.

“Whistleblowers” must be cautious to avoid baseless allegations. Allegations that are baseless and not made in good faith may result in disciplinary action.

Revision History:

Revision	Date	Description of changes	Requested By
0.0	9/28/2018	Initial Release	Executive Committee pursuant to Recommendation by the Audit Committee

[This page intentionally left blank.]