

## Whistleblower Policy

### I. Introduction

Oregon Crusaders (OC) requires staff, volunteers, and members to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. Representatives of OC must practice honesty and integrity in fulfilling their responsibilities and comply with all applicable policies, laws, and regulations.

While OC hopes that all those who come in contact with OC feel unhindered and unthreatened in raising concerns, OC recognizes that it is essential to also provide for confidential and anonymous submission of such concerns to ensure OC has a full opportunity to investigate and address any potential violations of policy, law, or regulation in the conduct of OC activities. Accordingly, the purpose of this Whistleblower Policy is to establish policies and procedures for:

- The submission of concerns regarding questionable accounting practices, questionable business ethics, conflicts of interest, acceptance, provision, or solicitations of bribes or kickbacks, legal and regulatory violations, or unsafe practices or activities by staff, volunteers, members and other OC stakeholders on a confidential and anonymous basis.
- The receipt, retention, and treatment of complaints received by OC regarding accounting, internal controls, conflicts of interest, acceptance, provision, or solicitations of bribes or kickbacks, legal or regulatory violations, or unsafe practices or activities.
- The protection of directors, volunteers, members and their families, and staff reporting concerns from retaliatory actions.

### II. Reporting Responsibility

Each staff, volunteer, and member of OC has an obligation to report, in accordance with this Whistleblower Policy:

(a) questionable accounting matters, questionable business ethics, conflicts of interest, acceptance, provision, or solicitations of bribes or kickbacks, legal or regulatory violations, or unsafe practices or activities by staff, volunteers, members and other OC stakeholders, and

(b) violations and suspected violations of the OC Code of Conduct. Reports shall be made any member of the Board. The Board will determine the appropriate designee(s), including appointment of appropriate Board members to a specially formed committee, for the conduct of an investigation or other further action.

To ensure that anyone affiliated with OC has the ability to report concerns, complaints and issues anonymously to OC, the organization has established on its websites, [www.oregoncrusaders.org](http://www.oregoncrusaders.org) and [www.ocindoor.org](http://www.ocindoor.org), an anonymous Web-based mechanism enabling anyone to send an email to the President of the Oregon Crusaders Board of Directors. This capability is featured prominently on our website as part of our published Whistleblower Policy. The President of the Board of the Directors is fully empowered to investigate each reported concern.

## **Whistleblower Policy**

### **III. Investigation and Confidentiality**

The Board, upon recommendation of the appropriate Board committee or other designee, has the authority to retain such outside investigators and experts as it deems necessary or appropriate to assist with any investigation or any other acts associated with the issues or concerns raised. All reports of concerns will be promptly investigated and the individual making the report (if not anonymous) will be notified of receipt of the report promptly, but no later than 7 days thereafter. Following conclusion of the investigation, the appropriate committee or designee will render a report to the Board along with conclusions and recommendations for any follow up action. Follow up with the complaining party shall be considered in consultation with appropriate legal counsel. Reports, investigations, reports of investigations, and any follow up will be maintained as confidential as reasonably possible.

### **IV. Retaliation**

OC will not retaliate, and prohibits retaliation by its staff, volunteers, and members, against anyone who makes a report in good faith pursuant to this Whistleblower Policy. OC reserves the right to take action against anyone who makes a report based upon false or misleading information, or without a reasonable basis for believing any wrongdoing has occurred.