



# LAKESHORE

<b>Department</b>	<b>Original Date</b>	<b>Responsible to</b>
Human Resources	12/20/2004	President
<b>Subject</b>	<b>Revision Date</b>	<b>Page</b>
Whistleblower Policy	10/09/2017 6/01/2022	1 of 2

**This policy and procedure rescinds any previous material covering this subject matter.**

## **I. POLICY**

Lakeshore Foundation has established procedures for employees, members, Board members, committee members, task force members, athletes, contractors, hearing panel members, and volunteers (“Individuals”) to protect and report suspicions of wrongful conduct and/or fraudulent activities within the organization.

## **II. PROCEDURE**

Individuals are encouraged to report confidentially, any wrongful conduct or fraudulent activity within Lakeshore Foundation. Individuals have a duty to report a complaint or alleged violation of Lakeshore Foundation policies and procedures, the Ted Stevens Olympic and Amateur Sports Act, U.S. Olympic and Paralympic Committee Bylaws, and any applicable state or federal laws by using this email ([ethics@Lakeshore.org](mailto:ethics@Lakeshore.org)) or by notifying their direct supervisor, if appropriate.

The [ethics@Lakeshore.org](mailto:ethics@Lakeshore.org) email is not intended for general venting or complaints. Please direct those to your immediate supervisor or human resources.

Concerns of wrongful conduct posing actual or imminent danger or threats of violence to persons or property are to be immediately reported to the Police and/or 911.

## **III. INVESTIGATION**

- The Director of Human Resources, the President and Chief Executive Officer (CEO) and the Chairman of the Board of Directors will be responsible for monitoring the [ethics@Lakeshore.org](mailto:ethics@Lakeshore.org) email.
- All reports will be treated as confidential as possible, given there could be some need to disclose information during the investigation process.
- The Director of Human Resources will lead all investigations. In the event that the complaint involves the Director Human Resources, the CEO will lead the investigation.
- The CEO and the Director of Human Resources make the determination on the alleged violations with applicable parties.

- In the event that the complaint involves the Director of Human Resources or the CEO, the determination will be made by the Chairman of the Board of Directors and/or Lakeshore Foundation legal team.
- Resolutions are executed by disinterested parties, including the Chairman of the Board of Directors and/or Lakeshore Foundation legal team.
- All necessary steps will be taken to address the matter as quickly and quietly as possible, up to and including termination of employment, membership or other association with Lakeshore Foundation.

Retaliation against any individual who reports, in good faith, wrongful conduct and/or participates in the investigation is prohibited.

#### **IV. DEFINITIONS**

Good Faith – an honest, reasonable belief that wrongful conduct has occurred or is occurring.

Retaliation – an adverse action taken against an individual who makes a good faith report of wrongful conduct or who participates in an investigation.

Wrongful Conduct – illegal, dishonest, immoral, discriminatory, or fraudulent activity that constitutes a serious violation of Lakeshore policies and procedures, state, or federal laws.