

Whistleblower Protection Policy of Traverse City Track Club, Inc.

a Michigan nonprofit corporation

Introduction

The Traverse City Track Club (TCTC) requires board members, event directors, officers, contract labor employees, and volunteers to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. As representatives of the organization, we must practice honesty and integrity in fulfilling our responsibilities and comply with all applicable laws and regulations.

Reporting Responsibility

It is the responsibility of all board members, event directors, officers, contract labor employees, and volunteers to comply with TCTC policies and to report violations or suspected violations of the law in accordance with this policy.

No Retaliation

No board member, event director, officer, contract labor employee, or volunteer, who in good faith reports a violation of the law, shall suffer harassment, retaliation, or adverse consequences even if the report is mistaken, or against any individual who assists in the investigation of the reported violation. A representative who retaliates against someone who has reported a violation of the law in good faith is subject to disciplinary action up to and including removal from the organization. This Whistleblower Policy is intended to encourage and enable representatives and others to raise concerns about illegal activity within the organization.

Reporting Alleged Violations

Board members, event directors, officers, contract labor employees, and volunteers are expected to report suspected violations of TCTC policies or illegal activities to the President of Traverse City Track Club. If the President is alleged to be in violation of the law, then the report should be submitted to the Vice President, with assistance from the Secretary. If legal counsel is needed, it will be engaged at that time by the President. The Vice President is authorized to retain legal counsel to address a complaint if it involves the President. A report of findings will be submitted to the Board with recommendations for action.

For a proper investigation to be conducted as much information as possible should be reported and it should clearly outline the perceived illegal act of violation of TCTC policies. The report should outline a specific incident with dates and names of individual(s) involved. This report should be supplied in order to conduct a sufficient investigation.

Accounting and Auditing Matters

The audit committee shall address all reported concerns or complaints regarding corporate accounting practices, internal controls, or auditing. The Chair of the Audit Committee shall immediately report to the TCTC President if any illegal accounting practices are reported by the independent auditors and will work with the Audit Committee until the matter is resolved.

Acting in Good Faith

Anyone filing a complaint concerning suspected illegal activity or a violation of TCTC policies must be acting in good faith and have reasonable grounds for believing the information disclosed indicates a violation of the law or TCTC policies. 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 malfeasance and addressed accordingly.

Confidentiality

Suspected illegal activity or suspected violations of TCTC policies may be submitted on the confidential basis by the complainant. Reports will be kept confidential to the extent possible except to the extent necessary, 1) to conduct a complete and fair investigation, or 2) for review of TCTC operations by the TCTC Audit Committee, the TCTC's independent public auditor, and the TCTC's legal counsel.

Handling of Reported Violations

The appropriate person as outlined in this policy to receive an official complaint will notify the complainant and acknowledge receipt of the reported within 5 business days. All reports will be promptly investigated and appropriate corrective action will be taken if warranted by the investigation. Outside legal counsel may be consulted as needed or warranted by the complaint.

I hereby certify that this Whistleblower Protection Policy of Traverse City Track Club, Inc. was duly approved and adopted at a meeting of its Board of Directors on January 29, 2018

Traverse City Track Club, Inc.

By: _James Graham - President