

## Topeka Swim Association Whistleblower Policy

Topeka Swim Association, Inc. (“TSA”) requires directors, officers and employees to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. As employees and representatives of TSA, we must practice honesty and integrity in fulfilling our responsibilities and comply with all applicable laws and regulations.

**Reporting Responsibility.** This Whistleblower Policy is intended to encourage and enable employees and others to raise serious concerns internally so that TSA can address and correct inappropriate conduct and actions. It is the responsibility of all board members, officers, employees and volunteers to report concerns about violations of TSA’s code of ethics or suspected violations of law or regulations that govern TSA’s operations.

**No Retaliation.** It is contrary to the values of TSA for anyone to retaliate against any board member, officer, employee, member, or volunteer who in good faith reports an ethics violation, or a suspected violation of law, such as a complaint of discrimination, or suspected fraud, or suspected violation of any regulation governing the operations of TSA. An employee, board member or officer who retaliates against someone who has reported a violation in good faith is subject to discipline up to and including termination of employment or removal from the TSA Board of Directors.

**Reporting Procedure.** TSA has an open door policy and suggests that members and/or employees and members share their questions, concerns, suggestions or complaints with their supervisor or their swimmer’s coach. If you are not comfortable speaking with your supervisor or your swimmer’s coach, or you are not satisfied with your supervisor’s or the coach’s response, you are encouraged to speak with a member of the Board of Directors (the “Board”). Supervisors are required to report complaints or concerns about suspected ethical and legal violations to TSA’s Board President in writing, who has the responsibility to investigate all reported complaints. Members and/or employees with concerns or complaints may also submit their concerns directly, in writing, to their supervisor or the Board President.

TSA’s Board President is responsible for ensuring that all complaints about unethical or illegal conduct are investigated and resolved. The Board President will advise the Board of all complaints and their resolution and will report at least annually to the Treasurer on compliance activity relating to accounting or alleged financial improprieties.

**Accounting and Auditing Matters.** TSA’s Board President shall immediately notify the Treasurer of any concern or complaint regarding corporate accounting practices, internal controls or auditing and work with the Audit Committee until the matter is resolved.

**Acting in Good Faith.** Anyone filing a written complaint concerning a violation or suspected violation must be acting in good faith and have reasonable grounds for believing the information disclosed indicates a violation. 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 a serious disciplinary offense.

**Confidentiality.** Violations or suspected violations may be submitted on a confidential basis by the complainant. Reports of violations or suspected violations will be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation.

**Handling of Reported Violations.** TSA's Board President will notify the person who submitted a complaint and acknowledge receipt of the reported violation or suspected violation. All reports will be promptly investigated and appropriate corrective action will be taken if warranted by the investigation.

Holly Fisher

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