



## Whistle Blower Policy

The Claudius Crozet Park (the "CCP") is committed to lawful and ethical behavior in all of its activities and requires directors, volunteers, and employees to act in accordance with all applicable laws, regulations and policies, and to observe high standards of business and personal ethics in the conduct of their duties and responsibilities.

It is important that the CCP be apprised about unlawful or improper behavior including, but not limited to, any of the following conduct:

- Embezzlement, theft or misappropriation of funds;
- Improper destruction of records;
- Providing false or misleading information on the CCP's financial documents, reports, tax returns or other public documents;
- Improper use of CCP assets, equipment and products; and/or
- Discrimination based on race, gender, sexual orientation, ethnicity and disability.

We request the assistance of every member of the Board of Directors, employee, or volunteer who has a reasonable belief or suspicion about any improper conduct to report such conduct. The CCP values this input and each individual should feel free to raise issues of concern, in good faith, without fear of retaliation. Individuals will not be disciplined, demoted, lose their jobs, or be retaliated against for asking questions or voicing concerns about conduct of this sort. At the same time, the CCP expects all individuals to take this policy seriously, to use it in good faith, and to use it when necessary and in a judicious manner. Reports that are not made in good faith, or are otherwise intended to harass or annoy another individual, may result in disciplinary action, up to and including removal or termination.

### **Making a Report**

Employees: Whenever possible, any employee who has a concern regarding an action concerning the CCP's compliance with applicable laws and regulations is encouraged to raise the concern with his/her manager or to any member of the CCP Executive Committee as needed until matters are satisfactorily resolved.

Board Members and Volunteers: Any Board member or volunteer should contact the CCP Board President or, if he/she is not comfortable bringing the matter to the attention of the President than any other member of the CCP Board of Directors.

Procedures: Whenever practical, concerns should be expressed in writing, and may be submitted anonymously. Because it is not possible to seek additional information from a concern expressed anonymously, it is essential that such reports contain as much specific information as possible. Written concerns should be addressed to either the “President” or any named Board Member and (i) delivered by hand to the President or Board Member; or (ii) mailed to the CCP at P.O. Box 171 Crozet, VA 22932.

### **Handling of Reports**

All reports filed in accordance with this policy will be investigated with due care and reasonable promptness. The President or a member of the Executive Committee will conduct an appropriate investigation to determine (i) whether the allegations are true, (ii) whether the issue raised is material, and (iii) what, if any, corrective action is necessary. The Executive Committee will issue a report of all matters raised under this policy to the CCP’s Board. If deemed necessary, the Executive Committee may conduct further investigation.

Reports of concerns, and related investigations, shall be kept confidential to the extent possible. However, consistent with the need to conduct an adequate investigation, the CCP cannot guarantee complete confidentiality. Disclosure of information relating to an investigation under this policy will be viewed as a serious disciplinary offense and, with respect to CCP employees, volunteers or Board members, may result in discipline, up to and including termination or, with respect to a director, removal from the Board of Directors.

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Submitted for CCP Board Review: March 4, 2015

Approved: March 4, 2015