



Whistleblower/Anti-Retaliation Policy

Rev. 5-15-2018

I. Introduction

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

While Crossmen hopes that all those who come in contact with Crossmen feel unhindered and unthreatened in raising concerns, Crossmen recognizes that it is essential to also provide for confidential and anonymous submission of such concerns to ensure Crossmen has a full opportunity to investigate and address any potential violations of policy, law, or regulation in the conduct of Crossmen 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 Crossmen stakeholders on a confidential and anonymous basis.
- The receipt, retention, and treatment of complaints received by Crossmen 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 Crossmen 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 Crossmen stakeholders, and

(b) violations and suspected violations of Crossmen Policies and Procedures. Reports shall be made to the Executive Director or 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 Crossmen has the ability to report concerns, complaints and issues, the email address ethics@crossmen.org has been established.

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

Crossmen 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. Crossmen 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.