

## USHJA POLICY STATEMENT

**Subject: Whistleblower Protection Policy**

**Policy Number: GA114**

**Date of Board Adoption: November 24, 2014**

**Board Approved Effective Date: November 24, 2014**

The Whistleblower Protection Policy of the United States Hunter Jumper Association, Inc. (“USHJA”) is intended to encourage and enable employees, Officers, Directors and volunteers of the organization to raise any and all serious concerns internally in order that USHJA can address and correct inappropriate conduct and actions. It is the responsibility of all Directors, Officers, employees and volunteers to report concerns about violations of the organization’s policies or suspected violations of law or regulations that govern USHJA’s operations.

1. Application. This Whistleblower Protection Policy applies to all USHJA staff, whether full-time, part-time, or temporary employees, to all volunteers, to all who provide contract services, and to all Officers and Directors, each of whom shall be entitled to protection.

2. Reporting Credible Information. A protected person shall be encouraged to report information relating to illegal practices or violations of policies of the Organization (“Violation”) that such person in good faith has reasonable cause to believe is credible. Information shall be reported to that member of the Audit Committee designated as the Compliance Officer (“Compliance Officer”), unless the report relates to or concerns that person in which case the report shall be made to the President of the organization or a member of the Board of Directors designated as an alternate for this instance. Such report shall be accepted by electronic or regular mail directly to the Compliance Officer at the address designated.

Anyone reporting a Violation **must** act in good faith and have reasonable grounds for believing that the information shared in the report indicates that a Violation has occurred.

3. Investigating Information. The Compliance Officer shall promptly investigate each such report and prepare a written report to the Board of Directors. In connection with such investigation all persons entitled to protection shall provide the Compliance Officer with credible information. All actions of the Compliance Officer in receiving and investigating the report and additional information shall endeavor to protect the confidentiality of all persons entitled to protection.

4. Confidentiality. The Organization encourages anyone reporting a Violation to identify himself or herself when making a report in order to facilitate the investigation of the Violation. However, reports may be submitted anonymously by: completing a “Whistleblower Reporting Form” and mailing the form to the Chair of the Audit Committee, c/o USHJA, 3870 Cigar Lane, Lexington, KY. Reports of Violations or suspected Violations will be kept confidential to the extent possible, with the understanding that confidentiality may not be maintained where identification is required by law or in order to enable the organization or law enforcement to conduct an adequate investigation.

5. Protection from Retaliation. No person entitled to protection shall be subjected to

retaliation, intimidation, harassment, or other adverse action for reporting information in accordance with this Policy. Any person entitled to protection who believes that he or she is the subject of any form of retaliation for such participation should immediately report the same as a violation of and in accordance with this Policy.

Any individual within the Organization who retaliates against another individual who has reported a Violation in good faith or who, in good faith, has cooperated in the investigation of a Violation is subject to discipline, including termination of employment or volunteer status.

6. Dissemination and Implementation of Policy. This Policy shall be disseminated in writing to all employees, Officers and Directors and volunteers and written acknowledgement shall be required in the manner consistent with status within organization. USHJA shall adopt procedures for implementation of this Policy, which may include:

- (1) Documenting Violations reported to Compliance Officer who may consult with USHJA Legal Counsel
- (2) Keeping the Board of Directors and/or the Audit Committee informed of the progress of the investigation;
- (3) Interviewing employees;
- (4) Requesting and reviewing relevant documents, and/or requesting that an auditor or counsel investigate the complaint; and
- (5) Preparing a written record of the reported violation and its disposition, to be retained in USHJA records for a specified period of time.

Following completion of any investigation, complainant shall be notified by electronic and/or regular mail about the status of the complaint, to what extent the complainant's identity has been disclosed and any other confidentiality and privacy limitations.