

## **Whistleblower Policy**

If an employee of The Northern California Volleyball Association (NCVA) witnesses or receives direct information that an NCVA policy, practice, or activity is in violation or breach of any NCVA policy, or federal or state law, then they should immediately report any information of the violation to the CEO/Commissioner, or to their direct supervisor. All employees are urged to directly notify the CEO/Commissioner on one or more of the following areas concerning:

- (a) Conduct or statements that are corrupt, dishonest, or fraudulent by an employee's manager;
- (b) A threat or act of criminal activity or violation of any applicable law or regulation;
- (c) A potential or actual danger to the public or employees' health, safety, and/or security;
- (d) Theft or fraud against NCVA;
- (e) Purposeful misinformation or false statement to or by a member of Senior Management or to public authorities;
- (f) Inappropriate accounting practices, internal accounting controls, or audit matters;
- (g) Abuse of authority, including but not limited to instructions not to report breaches of policy or violations of federal or state law to the appropriate party or to the proper authorities;
- (h) Abuse of authority by the CEO or delegated authority on instructions not to report breaches of policy or violations of federal or state law to the appropriate party or to the proper authorities;
- (i) Any form of threatening behavior or words, fraud, theft, questionable accounting, discrimination, harassment, or retaliation. All reports of allegedly illegal activity may be reported verbally or in writing to the CEO/Commissioner.

No employee of NCVA, whether as a part of Senior Management, as a director, an officer, employee, or volunteer who, in good faith, reports a violation of the above matters shall be harassed, threatened, discriminated against, demoted, discharged, or subjected to other forms of retaliation or other adverse consequences associated with the reporting. Any employee who retaliates against someone who has reported a violation in good faith is subject to discipline up to and including termination of employment or dismissal.

Any employee of NCVA reporting illegal activity must act in good faith and provide reasonable grounds or evidence of a legal violation. If an allegation of illegal activity is proven to have been made maliciously or knowingly to be false, such an event will be viewed as a serious offense subject to disciplinary action. Determinations regarding false claims will be made following a thorough and impartial investigation. Any disciplinary actions will be reviewed to ensure fairness and adherence to NCVA policies and applicable laws.

#### **Definitions and Examples:**

- **Good Faith:** A sincere belief, without malice, that the information reported constitutes a violation.
- **Retaliation:** Any adverse action taken against an employee for reporting in good faith, including termination, demotion, or harassment.
- **Examples of Reportable Conduct:** Fraudulent expense reporting, harassment in the workplace, or unsafe working conditions.

Complaints and reports of violations or suspected violations of any matter may be submitted to the CEO/Commission on a confidential basis. Reports and complaints of violations or suspected violations will be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation. NCVA will acknowledge receipt of a whistleblower complaint within 7-10 business days. Investigations will be conducted promptly and are generally expected to be resolved within 10 business days, depending on the complexity of the matter.

If an employee witnesses or receives direct information that the CEO has committed a violation of federal or state law, then the employee is to report the allegation, violation, and evidence to the NCVA Chairperson of the Board or a Board Personnel Committee member. This Whistleblower Policy carries the principle that any breach or violation is to be reported internally. Any reporting employee shall avoid and refrain from any form of seeking external or internal publicity or communications within the volleyball industry of an alleged breach or violation, unless there is a legal obligation to immediately report the same to an external party.

All reports and investigation records will be securely maintained by NCVA for a minimum of five years or as required by applicable laws. Access will be restricted to authorized personnel involved in the investigation.

#### **Training and Awareness:**

To ensure all employees understand their rights and responsibilities under this policy, NCVA will make this policy readily available in the employee handbook and company intranet. Employees are encouraged to review the policy annually.