

Norfolk Country Club
Whistleblower Policy and Procedure
Dated: December 15, 2012

The Norfolk Country Club (“NCC” or “the Club”) shall comply with relevant federal and state law and regulations applying to non-profit corporations and, to the extent required by law, conform to the legal rules governing public stock corporations, and shall comply with its bylaws. To encourage public confidence that the Norfolk Country Club will conform in practice to its announced policies and procedures and to legal compliance, NCC in this policy provides a clear process for individuals or organizations to submit confidential complaints alleging questionable conduct by its employees or other covered individuals, and for investigating and resolving such complaints.

NCC will not tolerate retaliation against any person who makes a good faith report about alleged questionable conduct. It is the express policy of the Norfolk Country Club that no employee or contractor may be discharged, disciplined, or discriminated against in any way for making a good faith whistleblower report or for cooperating in the investigation of such a report. Additionally, violations of the whistleblower policy will result in disciplinary action, which may include suspension or termination of employment.

Covered Individuals

Covered individuals include, but are not limited to, NCC’s at-will employees, contract employees, officers and directors, and volunteers. NCC will also generally communicate its policy to contractors, vendors, and consultants, and will encourage them to report any improper or questionable practices by NCC employees or other persons associated with NCC in positions of apparent trust, responsibility, or authority.

Covered Conduct

Covered conduct includes, but is not limited to, the following examples:

- Theft of cash, checks, or other financial instruments;
 - Misappropriation of accounts or other items of value;
 - Unauthorized destruction of financial, project, or personnel records;
 - Filing of fraudulent expense reports, over-billing, or authorizing over-billing by contractors, vendors, or consultants;
 - Making false or misleading statements to NCC managers or accountants;
 - Soliciting or receiving a bribe, unauthorized personal compensation, or a future benefit in exchange for providing NCC business;
 - Theft of NCC equipment or intentional damage to NCC equipment or other property;
- and

- Failing to report a personal conflict of interest that could potentially lead to NCC's financial harm.
- Reports by an employee or contractor of retaliation for making a good faith complaint in accordance with this policy.

Reporting Procedures

To the greatest extent possible and to the extent consistent with the needs of the investigation, the Club will take steps to maintain as confidential the identity of the individual making a complaint. The Club provides several avenues by which a complainant can express concerns, including anonymously.

1. Confidential Internal or External Complaint

A covered individual, or any other person, may make a confidential report **in person, by telephone, or by e-mail** to any one of the Club's managers, including the General Manager, the President, the House Committee chair, or any Board member. A Club manager who receives any complaint will report it immediately and solely to the President of the Club. The Club will take reasonable steps to assure that the identity of the complainant is not disclosed to anyone else, including the special committee investigating the complaint.

2. Anonymous Internal or External Complaint

A covered individual, or any other person, may make an anonymous complaint alleging questionable conduct by mailing a **written, unsigned message** to the President of the Club. The complainant should provide an email address or phone number if he or she wishes. In the event the complainant does not provide sufficient information to allow NCC to conduct an appropriate investigation, the President will use the contact information to inform the complainant that additional information is required in order to proceed with an investigation. The President will also use the contact information to report on the results of the investigation if the complainant requests it. The President will not share the contact information with the investigating committee or any other persons, unless it becomes necessary to pursue the issue raised, and then will consult with the complainant before disclosing.

Investigation Procedure

When a complaint is received, either confidentially or anonymously, the Club manager receiving the complaint will promptly inform the President of the Club.

The President will appoint a special committee of no more than three Board members (excluding the President, any Board member who received the complaint, and any Board member who is alleged to be implicated in the complaint) to conduct an appropriate investigation promptly and make a decision about the matter. The special committee will report its decision to the President, who will be responsible for implementing any actions needed to resolve the complaint in accordance with the decision made by the investigating committee.

If requested by the complainant, the complainant shall be informed of the results of the Club's investigation by the President.

Other than the person who received the complaint, and the President (if the complaint came in anonymously or to someone other than the President), no one other than the President shall be informed of the identity of the complainant at any point in this process, including at its conclusion, without prior discussion with the complainant.

Zero-Tolerance Retaliation Policy

The Norfolk Country Club will not tolerate retaliation against any person who makes a good faith report of conduct which he or she reasonably believes may constitute covered conduct. It is NCC's express policy that no employee or other person may be discharged, disciplined, or in any way discriminated against for making a good faith whistleblower report or for cooperating in the investigation of such a report. Any report of such retaliation shall be considered a complaint of covered questionable conduct and shall be investigated promptly with the results of the investigation reported to the President of the Club under the procedure stated above.

END OF POLICY