

WHISTLEBLOWER POLICY

Rationale

The Colts Youth Organization is committed to creating and maintaining an open and transparent environment where any person involved with the organization feels empowered to raise issues, concerns, and complaints.

This policy is intended to encourage and enable anyone to raise concerns related to ethics, policy violations, and misconduct on the part of anyone associated with the Colts Youth Organization, and to seek resolution within, prior to seeking resolution outside the organization.

Policy

The Colts Youth Organization requires directors, officers, employees, and volunteers of the Colts and its affiliate organizations to maintain high standards of business and personal ethics in the conduct of their duties and responsibilities. As representatives of the Colts Youth Organization, these individuals must practice honesty and integrity in fulfilling their responsibilities, and comply with all applicable laws, regulations, and policies.

It is the responsibility of all directors, officers, employees, and volunteers to report actual or suspected ethics violations, policy violations, or misconduct in accordance with this Whistleblower Policy.

No person who in good faith reports an ethics violation or other misconduct shall suffer harassment, retaliation, or adverse employment consequences.

Implementation

The Colts Youth Organization maintains an open-door philosophy and suggests that, initially, all people within the organization share their questions, concerns, suggestions, or complaints with someone who can address them properly. For employees, the supervisor is usually in the best position to address an area of concern. Supervisors are required to report suspected ethics violations to the President of the Board of Directors.

Employees who are not comfortable speaking with their supervisor, or who are not satisfied with the supervisor's response, as well as volunteers and others, should report concerns or complaints to someone in management with whom they feel comfortable - either the Tour Director, Corps Director, Executive Director, or the President of the Board of Directors.

Alternately, any person may report a concern or file a complaint electronically to whistleblower@colts.org, by mail to 2300 Twin Valley Drive Dubuque, IA 52003, or may submit a report anonymously and confidentially through the Colts website (<https://colts.org/whistleblower>).

All reports will be acknowledged upon receipt, unless the report was submitted anonymously, and will be promptly investigated. Reports, and the identity of reporters, will be kept confidential to the extent possible, consistent with the need to investigate and address the report. Appropriate corrective action will be taken if warranted by the investigation.

In coordination with the Executive Committee of the Colts Corporation, the Corps Director, Executive Director, and/or President, as appropriate, will ensure that a prompt review of the circumstances occurs and that appropriate measures are taken to resolve or correct the situation in an expeditious manner.

If a person is determined to have committed an ethical or policy violation, immediate and appropriate action will be taken, up to and including termination of employment, dismissal, and referral to appropriate law enforcement authorities, as needed.

Failure of a director, officer, employee, or volunteer to report an ethics violation; supervisory inaction; or retaliation against anyone who has reported a possible or actual violation of this policy may be cause for action up to and including termination of employment or dismissal from the Colts Youth Organization.

Maliciously or knowingly reporting false allegations of ethical violations, policy violations, or misconduct may also be cause for action up to and including termination of employment or dismissal from the Colts Youth Organization.