

OHIO HORSEMAN'S COUNCIL

Whistleblower Policy

General

The Ohio Horseman's Council ("the organization") requires all members to observe the highest standard of business and personal ethics in the conduct of their duties and responsibilities. As representatives of the organization, members must practice honesty and integrity in fulfilling responsibilities and comply with all applicable laws and regulations.

Reporting Responsibility

It is the responsibility of all members to observe the highest standards of business and personal ethics while conducting organization business and to report violations of suspected violations in accordance with this whistleblower policy.

No Retaliation

No member who in good faith reports a violation shall suffer harassment or retaliation, nor will he or she suffer an adverse employment consequence. A member who retaliates against someone who has reported a violation in good faith is subject to discipline up to and including expulsion from membership. This whistleblower policy is intended to encourage and enable members to raise serious concerns within the organization prior to seeking resolution outside the organization.

Reporting Violations

The organization suggests that members share their questions, concerns, suggestions or complaint with someone who can address them properly. The member is encouraged to speak with anyone in management that he or she is comfortable in approaching.

The compliance officer has specific and exclusive responsibility to investigate all reported violations. For suspected fraud, or if a member is either not satisfied or uncomfortable even after following the organization's open door policy, the member should contact the organization's compliance officer directly.

Compliance Officer

The organization's compliance officer, appointed by the president and ratified by the Executive Cabinet, is responsible for investigating and resolving all reported complaints and allegations concerning violations and, at his or her discretion, for advising the president and/or the Executive Cabinet. The compliance officer is required to report, at least annually, to the Executive Cabinet on compliance activity.

Acting in Good Faith

Anyone filing a complaint concerning a violation or suspected violation must be acting in good faith and have reasonable grounds for believing that the information disclosed indicates a violation of the code. Any allegations that prove to be false or unsubstantiated, and which prove to have been made maliciously or knowingly, will be viewed as a serious offense requiring disciplinary action.

Confidentiality

Violations or suspected violations may be submitted on a confidential basis by the complainant or may be submitted anonymously. Reports of violations or suspected violations will be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation.

Handling of Reported Violations

The compliance officer will notify the sender and acknowledge receipt of the reported violation or suspected violation within five (5) business days. All reports will be promptly investigated and appropriate corrective action will be taken if warranted by the investigation.

Adopted: _____ . 2018.