

Climbing Wall Association, Inc. Whistleblower Policy

The Climbing Wall Association (CWA) is committed to high standards of ethical and legal business conduct. CWA is further committed to acting in good faith with those employees, volunteers or vendors who raise concerns regarding incorrect or misleading financial reporting, unlawful activity, or other serious wrongdoing. Appropriate subjects to raise under this policy include financial indiscretion, accounting, audit or tax matters, ethical violations, conflicts of interest or other similar illegal or improper practices or policies.

This Whistleblower Policy (1) encourages employees, volunteers or vendors to come forward with credible information on illegal practices or serious violations of adopted (i.e. written) policies of the CWA; (2) specifies that the CWA will protect that person from retaliation; and (3) identifies to whom such information may be reported.

Other subjects for which the Organization has existing complaint processes should be addressed under those processes, such as raising matters of alleged discrimination or harassment. This policy is not intended, and shall not be construed, to provide a means of appeal from outcomes in those other processes. Employment-related concerns should continue to be reported through supervisors and the Human Resources chain unless the persons involved in those processes are themselves implicated in the wrongdoing.

Policy Statement

1. **Reporting.** The CWA encourages complaints, reports, or inquiries about illegal practices or serious violations of the Organization's policies, including illegal or improper conduct by the Organization itself, by its leadership, or by others on its behalf. No officer, director, employee or agent of CWA shall take any harmful action with the intent to retaliate against any person, including interference with employment or livelihood, for providing to a law enforcement officer any truthful information relating to the commission or possible commission of any offense. Nor will any officer, director, employee or agent of CWA take any harmful action with intent to retaliate against any person for reporting to an appropriate senior manager or officer of CWA the suspected misuse, misallocation, or theft of any CWA resources.
2. **Protection from Retaliation.** The Organization prohibits retaliation by or on behalf of the Organization against staff or volunteers for making good faith complaints, reports or inquiries under this policy or for participating in a review or investigation under this policy. This protection extends to those whose allegations are made in good faith but prove to be mistaken. The Organization reserves the right to discipline persons who make bad faith, knowingly false, or vexatious complaints, reports or inquiries or who otherwise abuse this policy.
 - a. *Harassment or Victimization* – CWA will not tolerate the harassment or victimization of any employee who raises concerns under this policy.
 - b. *Confidentiality* – CWA will make every effort to treat a complainant's identity with an appropriate regard for confidentiality, with the understanding that the details of complaints may need to be shared with others in order to investigate such complaints properly.

- c. *Anonymous Allegations* – Because a thorough investigation often depends on an ability to gather additional information, CWA encourages complainants to put their names to allegations of wrongdoing. CWA will explore anonymous allegations to the extent possible, but will weigh the prudence of continuing such investigations against the likelihood of confirming the alleged facts or circumstances without attributable sources. The Organization may be unable to fully evaluate a vague or general complaint, report or inquiry that is made anonymously.
3. **Procedure.** CWA intends this policy to be used for serious and sensitive issues only. Such concerns, including those relating to financial reporting or unethical or illegal conduct may be reported directly to the CEO. In the event that an individual's concern rises to the level that he/she reasonably believes that notice to the CEO will be disregarded or otherwise not fairly considered, the individual may then report violations or suspected violations to the Vice President. If both of these persons are implicated in the complaint, report or inquiry the report may be made to any other Officer or member of the Board of Directors.
 - a. *Timing* – The earlier a concern is expressed, the easier it is to take action.
 - b. *Evidence* – Although a complainant is not expected to prove the truth of an allegation, he or she should be able to demonstrate that he or she has made a report in good faith. The allegation should describe, in detail, specific information forming the basis for any complaint.
4. **Internal Review or Investigation.** The CWA will conduct a prompt, discreet and objective review or investigation.
 - a. *Initial Inquiries* – The CEO, or Board Member, will make initial inquiries in consultation with legal counsel, if necessary, to determine whether or not further review or investigation is appropriate or necessary.
 - b. *Further Information* – The CEO, or Board Member, may seek further information from any officer, director, employee or agent of CWA, and shall take all reasonable precautions to protect the identity of the complainant to the extent possible while doing so.
 - c. *Reporting* – The Board of Directors shall receive information on each complaint. In consultation with the CEO and, if necessary, legal counsel, the Board of Directors will determine an appropriate response to a report of concern.
 - d. *Recusal* – Officers, directors, employees or agents of CWA who may be implicated in such reports shall not participate in any deliberation of the Board of Directors related to the complaint, except to present information directly to the Board on his or her own behalf.
5. **Alteration or Termination.** CWA reserves the right to amend, alter and terminate this policy at any time and for any reason.

For additional information about this policy, please contact the CEO.