



San Antonio RoadRunners

PO Box 12474

San Antonio, TX 78212

SARR Policy 19-02

May 09, 2019

Whistleblower Policy

1. San Antonio RoadRunners (SARR) requires officers, directors and volunteers to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. As representatives of the organization, we must practice honesty and integrity in fulfilling our responsibilities and comply with all applicable laws and regulation.
2. It is the responsibility of all officers, directors, and volunteers to comply with San Antonio RoadRunners (SARR) policies and to report violations or suspected violations of the law in compliance with this policy.
3. No officer, director, or volunteer, who in good faith reports a violation of the law, shall suffer harassment, retaliation, or adverse consequence even if the report is mistaken, or against any individual who assists in the investigation of a reported violation. An officer or director who retaliates against someone who has reported a violation of the law in good faith is subject to disciplinary action up to and including removal from the Board and the Organization. This Whistleblower Policy is intended to encourage members and others to raise concerns about illegal activity within the organization.
4. Officers, directors, volunteers, and others associated with the organization are expected to report violations of SARR Policy to the SARR President. If the SARR President is alleged to be in violation of the law, then report should be submitted to the Executive Vice President and the Chair of the Finance Committee. A submitted report will be investigated by the President with the assistance of the Executive Vice President and the Chair of the Finance Committee if appropriate. If legal counsel is needed, it will be engaged at the time by the SARR President. The Executive Vice President is authorized to retain legal counsel to address a complaint if it involves the President. A report of findings will be submitted to the Board with recommendations for action.
5. Suspected illegal activity or suspected violations of SARR policies may be submitted on a confidential basis by the complainant. Reports will be kept confidential to the extent possible except to the extent necessary 1) to conduct a complete and fair investigation, or 2) for review of SARR operations by the SARR Finance Committee and the SARR legal counsel.

6. For a proper investigation to be conducted, as much information as possible should be reported and it should clearly outline the perceived illegal act or violation of SARR policy(ies). The report should outline a specific incident with dates and names of individual(s) involved. This report should be supplied in order to conduct a sufficient investigation.
7. The Finance Committee shall address all reported concerns or complaints regarding the organization's accounting practices, internal controls, or auditing. The Chair of the Finance Committee shall immediately report to the SARR President if any illegal accounting is reported and will work with the Finance Committee until the matter is resolved.
8. Anyone filing a complaint concerning suspected illegal activity or a violation of SARR policy must be acting in good faith and have reasonable grounds for believing the information disclosed indicates a violation of the law or SARR policy(ies). Any allegations that prove not to be substantiated and which prove to have been made maliciously and knowingly to be false will be viewed as malfeasance and addressed accordingly.
9. The appropriate person as identified in this policy to receive an official complaint will notify the complainant and acknowledge receipt within five business days. All reports will be promptly investigated, and appropriate corrective action will be taken if warranted by the investigation. Outside legal counsel may be consulted as needed or warranted by the complaint.
10. This policy has been adapted from the RRCA policy and the sample Whistleblower Policy written by the National Council of Nonprofit Associations, www.ncna.org 2004.

The following is a non-exhaustive list of the kinds of activities that should be reported:

- Supplying false or misleading information on the SARR's financial or other public documents including its Form 990.
- Destroying, falsifying, or concealing any records that are official documents of the organization and if the actions are a violation of the law.
- Altering, destroying, or concealing a document, or attempting to do so, with the intent to impair the document's availability for use in an official proceeding, in violation of federal or state law or regulations.
- Embezzling SARR funds or benefitting financially through association with SARR, for example serving on the Board and entering into a financially beneficial contract with the organization.
- Paying for services or goods that were not rendered or delivered: "laundering" funds.
- Using remarks or actions of a sexual nature that are not welcome and are likely to be viewed as personally offensive, including sexual flirtations; unwelcome physical or verbal advances; sexual propositions; verbal abuse of a sexual nature; the display of a sexual or particularly personal nature.

- Using epithets, slurs, negative stereotyping, and threatening, intimidating, or hostile acts that relate to race, color, religion, gender, national origin, age, or disability.
- Circulating or posting written or graphic material at races, training, or meetups that denigrates or shows hostility or aversion toward an individual or group because of race, color, religion, gender, nationality, age, or disability.
- Violating SARR's Conflict of Interest Policy, Whistleblower Policy, or Document Retention & Destruction Policy, or any other SARR policies.
- Facilitating or concealing any of the above or similar actions.

A handwritten signature in blue ink that reads "Scott Peacock". The signature is fluid and cursive, with a long horizontal flourish extending to the right.

SCOTT PEACOCK

President

San Antonio RoadRunners