

Forest Lake Hockey Association

Whistleblower Policy

Forest Lake Hockey Association (hereinafter “FLHA”) requires board members, officers, volunteers, and employees to observe high standards of business and personal ethics in the conduct of their duties. As employees and representatives of FLHA, we must practice honesty and integrity in fulfilling our responsibilities and comply with all applicable federal and state laws, policies, and regulations.

Purpose

FLHA encourages complaints, reports, or inquiries about illegal practices or serious violations of FLHA’s policies, including illegal or improper conduct by FLHA, its leadership, or by others on its behalf. This Whistleblower Policy is intended to empower and enable employees and others to raise internally serious, good faith, credible concerns about suspected ethical, financial, and/or legal violations so that FLHA has the opportunity to address and correct inappropriate conduct and actions before resolution is sought outside the organization. **It is the responsibility of all board members, officers, employees, and volunteers to report concerns about violations or suspected violations of FLHA’s policies, procedures, and any law or regulation that governs the organization and its governance or daily operations.**

FLHA’s Chief Compliance Officer (the “CCO”) is the President of the Board of Directors (“Board President”), or other person as appointed by the Board of Directors from time to time. The CCO is responsible for investigating and resolving all complaints about unethical or illegal conduct. The CCO will advise the Board of Directors of all complaints and their resolution and will report at least quarterly to the Treasurer and the Finance Committee on compliance activity relating to accounting or alleged financial improprieties.

The Board of Directors may hire a third-party investigator if a complaint involves the CCO or is deemed necessary by the seriousness of the complaint.

Reporting Responsibility and Procedure

FLHA seeks to have an “Open Door” policy and encourages board members, officers, volunteers, and employees to share their questions, concerns, suggestions, or complaints regarding FLHA and its operations with someone who can address them properly.

All complaints or concerns about violations and suspected ethical and legal violations must be investigated by the CCO.

In most cases, a board member or committee member should present his or her concerns to the CCO. An employee or volunteer should present his or her concerns to their supervisor. If the concerns involve the supervisor, the employee or volunteer shall notify the CCO.

If the reporting person (whistleblower) is not comfortable speaking with the CCO or their supervisor, or is not satisfied with the response, the whistleblower may speak with FLHA's legal counsel:

Jennifer L. Urban, Attorney for Nonprofits
Legal for Good PLLC
5353 Gamble Dr., Suite 320, St. Louis Park, MN 55416
Phone: (612) 284-6441 Mobile: (612) 418-0199 Fax: (612) 284-6421

Detailed Procedure for Handling Reported Violations

When a suspected violation is reported to a supervisor who is not the CCO, the supervisor shall promptly provide written communication to the CCO.

This detailed procedure begins when a violation or suspected violation is reported to the Board Chair or legal counsel, at which point, that person will:

1. In writing, describe in detail the specific facts demonstrating the basis of the report. If the party reporting the suspected violation is unwilling, or unable to provide a written report, the CCO or legal counsel shall prepare a written summation of the report.
2. Write to the party (or parties) making the allegation acknowledging receipt of the suspected violation and informing them that an investigation will be opened.
3. Collect any documentation related to the suspected violation. Ensure the original document or documents of the report, as well as the letter acknowledging receipt of the reported or suspected violations, are included in the memorialization record.
4. Conduct fact-finding regarding the suspected violation. Ensure that the investigation and corrective action(s) are completed in a timely manner by:
 - a. Preparing an estimated timeline for resolving the report.
 - b. Sharing the estimated timeline with the person who filed the violation and the Board when applicable.
5. Submit findings to the Board, if warranted.
6. Maintain written records of the complaints and allegations along with all correspondence and actions taken to resolve them. These written records are maintained in a confidential Board folder. If the CCO is involved in the suspected violations, these records will be kept off site as determined by the legal counsel.

No Retaliation

FLHA has a strict anti-retaliation policy that protects anyone who, in good faith, reports an ethics violation, suspected violation of law (such as a complaint of financial impropriety, discrimination, or suspected fraud), or suspected violation of any regulation governing the operations of FLHA. It also protects those 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. Any board member, officer, employee, or volunteer who retaliates against someone who has, in good faith, reported a violation is in violation of this policy.

Forest Lake Hockey Association: *Whistleblower Policy*
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reported a violation is subject to discipline up to and including termination of employment or involvement in the organization.

Accounting and Auditing Matters

The CCO shall immediately notify the Treasurer and the Finance Committee of any concerns or complaint(s) regarding corporate accounting practices, internal controls, or auditing, and shall work with the Finance Committee until the matter is resolved.

Acting in Good Faith

Anyone filing a written complaint concerning a violation or suspected violation must be acting in good faith and have reasonable grounds for believing that the disclosed information indicates a violation. Unsubstantiated allegations found to be made with malicious intent or that were knowingly falsified will be viewed as a serious disciplinary offense.

Confidentiality

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

[SIGNATURE PAGE IMMEDIATELY FOLLOWS]

Acknowledgment

My signature below acknowledges that I have received a copy of Forest Lake Hockey Association's Whistleblower Policy. I agree to read, understand, and adhere to this policy and acknowledge that FLHA may modify or terminate this Whistleblower Policy at any time for any reason in its sole discretion. I also understand that if I have questions regarding the contents of this policy, I should ask my supervisor, the Chief Compliance Officer, or the Board Treasurer for clarification.

Signature: _____

Printed Name: _____

Date: _____