

WCA – WCC
(“Wilderness”)

WHISTLEBLOWER POLICY

Wilderness requires directors, officers and employees to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. As employees and representatives of Wilderness, we must practice honesty and integrity in fulfilling our responsibilities and comply with all applicable laws and regulations.

Reporting Responsibility

This Whistleblower Policy is intended to encourage and enable employees and others to raise serious concerns internally so that Wilderness can address and correct inappropriate conduct and actions. It is the responsibility of all board members, officers, employees and volunteers to report concerns about violations of Wilderness’s code of ethics or suspected violations of law or regulations that govern Wilderness’s operations.

No Retaliation

It is contrary to the values of Wilderness for anyone to retaliate against any board member, officer, employee or volunteer who in good faith reports an ethics violation, or a suspected violation of law, such as a complaint of discrimination, or suspected fraud or theft, or suspected violation of any regulation governing the operations of Wilderness. Any person who retaliates against someone who has reported a violation in good faith is subject to discipline up to and including termination of employment or resignation from the Board of Directors.

Reporting Procedure

Wilderness has an open-door policy and encourages all employees to share their questions, concerns, suggestions or complaints with their supervisor. If you are not comfortable speaking with your supervisor or you are not satisfied with your supervisor’s response, you are encouraged to speak with the General Manager or Board President. If you are not comfortable speaking with the General Manager or Board President, you may contact a member of the Board of your choice. Supervisors, managers and board members are required to report complaints or concerns about suspected ethical and legal violations in writing to the Board President, who has the responsibility to investigate all reported complaints and advise the Board of Directors of all complaints and their resolution. In the event the concern or complaint involves the Board President, the Board Vice President shall be responsible for investigating and reporting the complaint and its resolution to the Board of Directors.

The Board President shall immediately notify the Treasurer of any concerns or complaints regarding corporate accounting practices, internal controls or audit matters and work with the Treasurer 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 the information disclosed indicates a violation. Any allegations that prove not to be substantiated, or which prove to have been made maliciously or knowingly to be false, will be viewed as a serious disciplinary offense subject to discipline up to and including termination of employment or resignation from the Board of Directors.

Confidentiality

Violations or suspected violations must be submitted in writing 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.

Handling of Reported Violations

Wilderness's Board President will provide written notice to the person who submitted a complaint to acknowledge receipt of the reported violation or suspected violation. All reports will be promptly investigated and appropriate corrective action will be taken if warranted by the investigation.

Approved by the WCA and WCC Boards of Directors – February 18, 2019