

SOP #	OAP-3	Revision:	Original	Prepared by:	BOD 2010
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Title: **Whistleblower Policy**

Policy: It shall be the policy of Sir Walter Gun Club, Inc. (SWGCI) to adhere to the procedures below regarding receiving, investigating, properly processing, and resolving any and all complaints brought before the Club.

Purpose: To establish an open door policy and transparent process for handling complaints brought before the Club.

Scope: This policy shall apply to any and all members of SWGCI and other non-members having a valid complaint or issue regarding SWGCI.

Procedure: The following procedures are hereby established:

General

Sir Walter Gun Club, Inc. (SWGCI) requires directors, officers and members to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. As members and representatives of the SWGCI, we must practice honesty and integrity in fulfilling our responsibilities and comply with all applicable laws and regulations.

Reporting Responsibility

It is the responsibility of all directors, officers and Club members to report ethics violations or suspected violations in accordance with this Whistleblower Policy.

No Retaliation

No officer, director, or Club member who in good faith reports an ethics violation shall suffer harassment, retaliation or adverse consequences. Any member who retaliates against someone who has reported a violation in good faith is subject to discipline up to and including termination of their membership from SWGCI. This Whistleblower Policy is intended to encourage and enable members of the Club and others to raise serious concerns within SWGCI prior to seeking resolution outside SWGCI.

Reporting Violations

SWGCI has an open door policy and suggests that members share their questions, concerns, suggestions or complaints with someone who can address them properly. In most cases, the member is encouraged to speak directly to any member of the Board of Directors. The Board member receiving the complaint shall promptly notify and inform the other appropriate members of the Board. The President of the Board shall appoint a member or members of the Board to investigate the complaint or alleged violation and report back to the Board with their findings. The Board of Directors shall determine if the complaint is founded or unfounded and then take appropriate action to resolve the issue.

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 the information disclosed indicates a violation. Any allegations that prove not to be substantiated and which prove to have been made maliciously or knowingly to be false will be viewed as a serious disciplinary offense.

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 Board of Directors will notify the sender and acknowledge receipt of the reported violation or suspected violation in a timely manner. All reports will be promptly investigated and appropriate corrective action will be taken if warranted by the investigation.