

## AVA WHISTLEBLOWER POLICY

(adopted January 20, 2012)

### Purpose

The American Volkssport Association is committed to high standards of ethical, moral and legal business conduct. In line with this commitment, and the American Volkssport Association's commitment to open communication, this policy aims to provide an avenue for employees, directors, officers and volunteers to raise concerns and to provide reassurance that they will be protected from reprisals or victimization for whistleblowing. If any employee, director, officer or volunteer reasonably believes that some policy, practice, or activity of the American Volkssport Association is in violation of law, a written complaint may be filed by that person, as outlined below.

This whistleblowing policy is intended to provide protections for an individual who raises concerns regarding the American Volkssport Association, such as:

- incorrect financial reporting;
- unlawful activity;
- activities that are not in line with the American Volkssport Association policy; or
- activities which otherwise amount to serious improper conduct.

### Safeguards

*Harassment or Victimization* - Harassment or victimization for reporting concerns under this policy will not be tolerated.

*Confidentiality* - Every effort will be made to treat the complainant's identity with appropriate regard for confidentiality.

*Anonymous Allegations* - This policy encourages individuals to put their names to allegations because appropriate follow-up questions and investigation may not be possible unless the source of the information is identified. Concerns expressed anonymously will be explored appropriately, but consideration will be given to:

- the seriousness of the issue raised;
- the credibility of the concern; and
- the likelihood of confirming the allegation from attributable sources.

*Bad Faith Allegations* - Allegations made in bad faith by employees may result in disciplinary action up to and including termination.

**Procedure: 1. Process for Raising a Concern**

*Reporting* - The whistleblowing procedure is intended to be used for serious and sensitive issues. Such concerns, including those relating to financial reporting, unethical or illegal conduct, may be reported directly to:

\_\_\_\_\_, Executive Director  
1001 Pat Booker Road, Suite 101  
Universal City, TX 78148  
210-659-2112  
\_\_\_\_\_@ava.org

or:

\_\_\_\_\_, President  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_@ava.org

Upon receipt of a report, the Executive Director and the President will respond directly to the complainant within 30 days.

Employment-related concerns should continue to be reported through normal channels.

*Timing* - The earlier a concern is expressed, the easier it is to take action.

*Evidence* - Although the complainant is not expected to prove the truth of an allegation, the complainant should be able to demonstrate to the person contacted that the report is being made in good faith.

**Procedure: 2. How the Report of Concern will be Handled**

The action by the American Volkssport Association in response to a report of concern under this policy will depend on the nature of the concern. The Audit Committee of the American Volkssport Association National Executive Council shall receive information on each report of concern and follow-up information on actions taken.

*Initial Inquiries* - Initial inquiries will be made to determine whether an investigation is appropriate, and the form that it should take. Some concerns may be resolved without the need for investigation.

*Further Information* - The amount of contact between the complainant and the person or persons investigating the concern will depend on the nature of the issue and the clarity of information provided. Further information may be sought from or provided to the person reporting the concern.

**Acknowledgment of Receipt by Employee**

My signature below indicates my receipt and understanding of this policy. I also verify that I have been provided with an opportunity to ask questions about the policy.

\_\_\_\_\_  
Employee Signature

\_\_\_\_\_  
Date