



WHISTLEBLOWER POLICY

NOTE: At this time VSAHA has no employees.

This Policy and procedures are for employees, independent contractors, volunteers, and board members of Vermont State Amateur Hockey Association (“VSAHA”), and any good faith reporter or other reasonable parties (i.e., witnesses, victims) (“Covered Parties”) to be protected under this policy and to identify concerns about actual or suspected violations of:

- A. The bylaws, rules & regulations and policies of VSAHA;
- B. Federal and applicable state law;
- C. USA Hockey’s applicable codes of conduct;
- D. Legal and regulatory requirements regarding financial reporting and disclosure requirements, preparation of financial statements, accounting practices, internal accounting controls, financial audit matters, matters concerning fraud against VSAHA, or inappropriate use of its resources, including without limitation billing for services not performed or goods not delivered and fraudulent financial reporting.

Any Covered Party is encouraged and has the right to report actual or alleged violations set forth above. Covered Parties are required to report any violations of the applicable codes of conduct. Failure by any employee, volunteer or board member to report a violation of this Policy may subject such person to discipline.

A whistleblower as defined by this Policy is any Covered Party who reports an activity that he or she considers to be addressed by this Policy. The whistleblower is not responsible for investigating the activity or for determining fault or corrective measures; appropriate officials of VSAHA are responsible for such actions.



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Submitting a Report

VSAHA respects the legal rights of Covered Parties to report the type of actual or suspected activity addressed by this Policy directly to government agencies, or USA Hockey management personnel. Alternatively, the reporting process described below may be followed.

If a Covered Party has knowledge of or a concern regarding activities addressed by this Policy, the individual should contact the VSAHA President, who shall in turn refer applicable matters to the Rules Committee for review. An individual may also submit a written report anonymously to the Chair of the Rules Committee, however, that may make investigation more difficult. Reports should be factual and contain as much specific information as possible to allow a proper assessment. This is particularly critical if a report is submitted anonymously.

Anyone making a report concerning a violation or suspected violation must be acting in good faith and have reasonable grounds for believing the information disclosed indicates an actual or potential issues addressed by this Policy. Any allegations that prove to have been made maliciously or knowingly to be false will be viewed as a serious disciplinary offense and may be reported as such.

Whistleblower Protections – Confidentiality and Anti-Retaliation

Whistleblower protections cover two important areas; confidentiality and anti-retaliation. To the extent possible, the confidentiality of the whistleblower will be maintained. However, an individual's identity may have to be disclosed to conduct a thorough investigation, to comply with law, or to provide accused individuals their legal rights of defense.



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VSAHA has zero tolerance for retaliation against people who make good faith reports under this Policy or those who cooperate with investigations of those reports. “Retaliation” for the purposes of this Policy, includes, without limitation, any adverse or discriminatory action, or the threat of an adverse or

discriminatory action, carried out against an athlete, coach, trainer, manager, administrator, official, employee, board member or officer, as a result of any report, complaint, or other communication reporting misconduct of any kind to VSAHA, USA Hockey or any law enforcement agency or government entity.

The right of the whistleblower to protection against retaliation does not include protection against personal wrongdoing by an individual.

Investigation and Resolution

The Rules Committee shall be responsible for the investigation of any allegations of a violation of this Policy by employees, independent contractors, volunteers, and board members, and if it determines that a violation of this Policy has occurred, adjudication shall be in accordance with the procedures and requirements of USA Hockey Bylaw 10.