



## HURON MOUNTAIN CLUB

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### Whistleblower Protection Policy

#### Reporting Responsibility

This Whistleblower Protection Policy is intended to encourage and enable employees and others, including members, to raise serious concerns internally so that the Huron Mountain Club ("Club") can address and correct inappropriate conduct and actions. It is the responsibility of all Board members, members, Club management and employees to report concerns about violations of the Club's Code of Ethics or suspected violations of law or regulations that govern the Club's operations.

#### No Retaliation

It is contrary to the values of the Club for anyone to retaliate against any Board member, member, staff member or vendor who in good faith reports an ethics violation, or a suspected violation of law, such as a complaint of discrimination, or suspected fraud, or suspected violation of any regulation governing the operations of the Club. An employee who retaliates against someone who has reported a violation in good faith is subject to discipline up to and including termination of employment.

#### Reporting Procedure

The Club has an open door policy and suggests that employees 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 a Board member. Supervisors and the General Manager are required to report complaints or concerns about suspected ethical and legal violations in writing to the Club's Secretary of the Club ("Secretary"), who has the responsibility to investigate all reported complaints. Employees or members with concerns or complaints may also submit their concerns in writing to their supervisor or the General Manager or the Secretary.

#### Secretary's Responsibility

The Secretary is responsible for ensuring that all complaints about unethical or illegal conduct are investigated and resolved. The Secretary will advise the General Manager and the Board of Directors of all complaints and their resolution and will report at least annually to the Treasurer on compliance activity relating to accounting or alleged financial improprieties.

#### Accounting and Auditing Matters

The Secretary shall immediately notify the Finance Committee of any concerns or complaint regarding corporate accounting practices, internal controls or auditing and work with the 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 responsible 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 offence.

#### 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.

#### Handling of Reported Violations

The Club's Secretary will notify the person who submitted a complaint and 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.

Policy approved by the Board of Directors on February 23, 2019