



## Sample TU Chapter/ Council Whistleblower Policy

### - CHAPTER or COUNCIL NAME requires directors and officers to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. As representatives of Trout Unlimited, 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 directors and officers to raise serious concerns internally so that ### - CHAPTER or COUNCIL NAME can address and correct inappropriate conduct and actions. It is the responsibility of all board members, officers, volunteers (and employees, if applicable) to report concerns about violations of ### - CHAPTER or COUNCIL NAME's code of ethics or suspected violations of law or regulations that govern our operations.

### **No Retaliation**

It is contrary to the values of Trout Unlimited for anyone to retaliate against any board member, officer, 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 suspected violation of any regulation governing the operations of ### - CHAPTER or COUNCIL NAME.

### **Reporting Procedure**

### - CHAPTER or COUNCIL NAME has an open door policy and suggests that all officers, directors, volunteers share their questions, concerns, suggestions or complaints with the chapter/ council executive committee. If you are not comfortable speaking with the executive committee or you are not satisfied with their response, you are encouraged to speak with [insert here another title, such as Executive Director or Council Chair].

### - CHAPTER or COUNCIL NAME's (president or council chair) is responsible for ensuring that all complaints about unethical or illegal conduct are investigated and resolved. The president/ council chair will advise the Board of Directors of all complaints and their resolution.

Any volunteer who is not satisfied with the response of their chapter president or their council chair, may report the violation to TU National [volunteer operations staff](#). Any volunteer who remains concerned after speaking with [volunteer operations staff](#), or feels uncomfortable speaking with such persons (for whatever reason,) should contact TU's Chief Executive Officer. In any such situation, the volunteer will be protected from retaliation for initiating a report.

In the instance where the violation involves theft or the misuse (or suspected thefts or misuse) of chapter or council money or other property in a responsible and consistent manner, the chapter/ council will defer to [the Policy on Financial and Property Controls](#) for the proper procedure.

### **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 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. 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**

### - CHAPTER or COUNCIL NAME 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.



## Code of Ethics

At TU we are committed to honest and ethical behavior and to accomplishing our mission with integrity. Integrity in all aspects of our operations is central to our success as a credible broker of scientifically and economically responsible conservation solutions. This Code of Ethics is designed to put in place a system to ensure we are aware of and can take prompt action against any questionable behavior. It is also intended to help each of us focus on the duty we owe to our members. This Code applies to each and every one of TU's volunteers on the chapter and council level, since we are all responsible for safeguarding and promoting TU's reputation. Of course, many situations will involve subtleties and complexities that lead to difficult choices. When in doubt, take a step back to ask yourself whether the situation feels right, and consider whether you feel confident that your actions would withstand scrutiny. If necessary, take another careful look at this Code for guidance and seek advice from [volunteer operations staff](#).

### **Company Assets**

TU chapter or council assets must be safeguarded and used only for accomplishing TU's mission. This includes, without limitation, protection (including from loss or theft) of the TU chapter or council's funds, physical facilities, office equipment, computer software, records, donor information, TU's trademarks and other proprietary information (see section regarding "Confidential Information.") [Chapter 8: Safeguarding Chapter and Council Assets](#), addresses the Trout Unlimited Policy on Financial and Property Controls for Chapters and Councils, and that policy sets out requirements and best practices for safeguarding your chapter's or council's assets.

### **Legal Compliance**

TU and volunteers acting in TU's name must obey and comply with all applicable laws and regulations. It is every volunteer's responsibility to be aware of and to comply with legal requirements applicable to his/her position.

### **Personal Integrity**

It is important for the integrity of the whole organization that TU's leaders be persons of integrity. While the Board does not expect council or chapter leaders to conduct background checks on current or prospective officers and members of boards of directors, chapters and councils must not knowingly elect to a chapter or council office or to a chapter or council board of directors a person who has been convicted of a crime involving fraud, dishonesty or financial impropriety or who is a registered sex offender. The Organizational Development Committee of the Board of Trustees may grant an exception to this provision.

### **Openness and Disclosure**

It is TU's responsibility to provide comprehensive and timely information to the public, the media, and all stakeholders about its operations upon request. All information about any particular chapter or council will fully and honestly reflect its current operations.

In raising funds, TU chapters and councils will respect the rights of donors, as follows:

- To be informed of TU's mission, the way the resources will be used, and the chapter/council's capacity to use donations effectively for their intended purposes;

- To be informed of the identity of those serving on the organization's Board of Directors and to expect the board to exercise prudent judgment in its stewardship responsibilities;
- To have access to the chapter or councils most recent financial reports and form 990, 990EZ, or 990N;
- To be assured that all restricted gifts will be used for the purposes for which they were given;
- To receive appropriate acknowledgement and recognition for gifts ([For a sample donor letter, see the Tacklebox.](#))
- To be assured that information about donations is handled with respect and with confidentiality to the extent provided by the law;
- To expect that all relationships with individuals representing TU will be professional in nature;
- To be informed whether those seeking donations are volunteers, employees of the organizations, or hired solicitors;
- To have the opportunity for their names to be deleted from mailing lists that the chapter or council intends to share; and,
- To feel free to ask questions when making a donation and to receive prompt, truthful and forthright answers.

### **Confidential Information**

While TU strives to be as open as possible about its operations, certain information is by nature confidential and should not be disclosed to the public, including, but not limited to:

- All donor and member personal information;
- Information relating to hiring decisions and to current, former and prospective employees; and
- Financial reports and data that have not been formally reported to the public through presentations to the Board of Trustees, Federal Form 990, 990N, or audited financial statements. Such information represents a valuable corporate asset that should be protected as we protect other valued assets.

### **Conflicts of Interest**

Volunteers must avoid any personal activity, investment or association that could interfere with, or could appear to interfere with, good judgment concerning TU's best interests. Volunteers may not use TU property, information or position for personal gain, including taking personal opportunities that are discovered through the use of TU property, information or position. Volunteers should avoid even the appearance of such a conflict. For example, there is a likely conflict of interest if a volunteer

- causes the chapter or council to engage in business transactions with relatives or friends;
- uses nonpublic TU, donor or vendor information for personal gain by his/herself, relatives or friends (including securities transactions based on such information);
- has more than a modest financial interest in the chapter or council's vendors, donors or competitors; or
- competes, or prepares to compete, with the chapter or council while still serving on the chapter or council Board of Directors.

There are other situations in which a conflict of interest may arise. Any volunteer who becomes aware of any material transaction or relationship that could reasonably be expected to give rise to such a conflict of interest, or has concerns about any situation, must follow the steps outlined in the section of this chapter entitled "Reporting Violations."

### **Fair Dealing**

No volunteer may take unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts, or any other unfair-dealing practice. Volunteers should endeavor to deal fairly with the TU's donors, suppliers, competitors and employees.

### **Gifts, Bribes and Kickbacks**

Other than for modest gifts and benefits given and received in the normal course of business, no volunteer may give gifts to or receive gifts from the chapter or council's donors and vendors. In no event should a volunteer put the chapter or council in a position that would be embarrassing if the gift were made public. Dealing with government employees often is different from dealing with private persons. Many governmental bodies strictly prohibit the receipt of any gratuities by their employees, including meals and entertainment. Volunteers must be aware of and strictly follow such prohibitions. Any volunteer who pays or receives bribes or kickbacks will be subject to corrective action, and reported, as warranted, to the appropriate authorities. *A kickback or bribe includes anything of value intended to improperly obtain favorable treatment.*

### **Loans**

No volunteer may request or accept a loan from TU national, a TU chapter, or council.

### **Political Contributions**

Chapters, councils, or volunteers or staff acting on behalf of TU may not endorse or oppose any candidate for public office, nor can TU use its funds to support or oppose candidates for elected political office. The prohibition is found in the federal tax code. Volunteers may, however, engage in political activity with your own resources on your own time, subject to applicable law and the TU policies and rules governing such political activity. [For more information on this restriction, read our Tax Exemption Restrictions overview document.](#)

### **Harassment**

Inappropriate behavior and unlawful harassment create conditions that are wholly inconsistent with TU's commitment to a culture that respects the dignity and worth of each individual. TU seeks to foster an environment that is free from all forms of harassment or discrimination, whether that harassment or discrimination is because of race, color, gender, age, religion, national origin, sexual orientation, disability, veteran status or any other characteristic protected by law. Discriminatory harassment, including sexual harassment, will not be tolerated by TU.

Sexual harassment is defined as unwelcome sexual advances, requests for sexual favors, and other verbal or physical conduct of a sexual nature when: submission to such conduct is either explicitly or implicitly made a term or condition of an individual's involvement with the chapter or council; or submission to or rejection of such conduct is used as the basis for involvement with the chapter or council; or such conduct creates an intimidating, hostile or offensive environment. Other harassment is defined as verbal or physical conduct that denigrates or shows hostility or aversion toward an individual because of his/her race, color, gender, age, religion, national origin, sexual orientation, disability, veteran status or any other characteristic protected by law or that creates an intimidating, hostile or offensive environment.

TU strongly encourages the prompt reporting of all incidents of discriminatory harassment. If you believe you are being harassed or have observed harassment, TU encourages you to promptly notify [volunteer operations staff in accordance with the Whistleblower Policy.](#)

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