



Trout Unlimited Sample Whistleblower/ Conflict of Interest Policy for Chapters and Councils

- CHAPTER or COUNCIL NAME requires directors and officers (and employees, if applicable) 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.

Conflict of Interest

No director of ### - CHAPTER or COUNCIL NAME board shall enter into a contractual relationship with ### - CHAPTER or COUNCIL NAME for the benefit of the director without approval of the board. Any director entering into such a contract shall make a full disclosure to ### - CHAPTER or COUNCIL NAME board of directors and may discuss the matter with ### - CHAPTER or COUNCIL NAME board, but shall not be in attendance when the board votes on such a contract.

No contract or other transaction between the ### - CHAPTER or COUNCIL NAME and one or more of its directors or any other corporation, firm, association, or entity in which one or more of its director is an officer or is financially interested, shall be either void or voidable if:

- the fact of such relationship or interest is fully disclosed or known to the ### - CHAPTER or COUNCIL NAME board of directors or committee thereof which authorizes, approves, or ratifies the contract or transaction by a vote or consent sufficient for such purpose without counting the votes or consents of such interested directors: and
- the contract or transaction is fair and reasonable to ### - CHAPTER or COUNCIL NAME. Interested directors may be counted in determining the presence of a quorum at a meeting of the board of directors or committee thereof which authorizes, approves, or ratifies such contract or transaction.

The reimbursement of a director of board for expenses incurred in attending meetings or other work on behalf of ### - CHAPTER or COUNCIL NAME shall not be considered a conflict of interest.

Reporting Responsibility

This Policy is intended to encourage and enable directors and officers (and employees, if applicable) 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 TU for anyone to retaliate against any board member, officer, volunteer (or employee, if applicable) 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. (If applicable, 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

- CHAPTER or COUNCIL NAME has an open door policy and suggests that all officers, directors, volunteers (and employees, if applicable) share their questions, concerns, suggestions or complaints with the chapter/ council executive committee (or, if applicable, the employee's supervisor.)

If you are not comfortable speaking with the executive committee (or, if applicable, the employee's supervisor) or you are not satisfied with their response, you are encouraged to speak with the Vice President for Volunteer Operations. 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.

- 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.

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.

- 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.

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.

Conflict of Interest and Disclosure Questionnaire

To be completed by all chapter/ council officers and directors annually.

Name: _____

Position (Board member): _____

Please describe below any relationships, transactions, positions you hold (volunteer or otherwise), or circumstances that you believe could contribute to a conflict of interest between the TU chapter or council and your personal interests, financial or otherwise:

- I have no conflict of interest to report
- I have the following conflict of interest to report:

1. _____

2. _____

3. _____

I hereby certify that the information set forth above is true and complete to the best of my knowledge. I have reviewed, and agree to abide by, the Policy of Conflict of Interest of Trout Unlimited.

Signature: _____

Printed Name: _____

Date: _____