

IBEX SKI CLUB

P.O. Box 1542

Palatine, Illinois 60078

BOARD OF DIRECTORS POLICY #28

Whistleblower Policy

I. PURPOSES

Ibex Ski Club (the "Organization") is committed to honest, ethical and lawful conduct, full, fair, accurate, timely and transparent disclosure in all public communications, and compliance with applicable laws, rules and regulations. In furtherance of these commitments, all directors, officers, volunteers and members of the Organization (each, a "Covered Person" or "you") must act in accordance with all applicable laws and regulations, and with the policies of the Organization at all times, and assist in ensuring that the Organization conducts its business and affairs accordingly.

This Whistleblower Policy (this "Policy")

- (a) establishes procedures for the reporting and handling of concerns regarding action or suspected action taken by or within the Organization that is or may be illegal, fraudulent or in violation of any policy of the Organization, as well as any other matter that could cause serious damage to the Organization's reputation (each, a "Concern"), and
- (b) prohibits retaliation against any Covered Person who reports a Concern in good faith.

By appropriately responding to Concerns, we can better support an environment where compliance is valued and ensure that the Organization is meeting its ethical and legal obligations.

II. WHEN TO RAISE A CONCERN

You have an affirmative duty to disclose to and seek guidance from an appropriate club officer or director if you believe any Covered Person or other person associated or doing business with the Organization has engaged, is engaging, or may engage in any illegal or unethical behavior or has violated, or may violate any law, rule, regulation or policy of the Organization. Such reportable activity may include, for example, financial wrongdoing (including circumvention of internal controls or violation of the accounting policies of the Organization), fraud, harassment, or any other illegal, unethical, or proscribed conduct. While Concerns may be submitted at any time, you should endeavor to report a Concern as soon as reasonably possible after becoming aware of the matter.

III. HOW TO RAISE A CONCERN

Concerns may be submitted either in writing or orally. No form is required to submit a Concern, but you are encouraged to provide as much information and detail as possible so that the Concern can be properly investigated.

A Concern may be submitted:

- To any club officer or director, who will in turn forward the Concern to the Board of Directors for review where appropriate; or
- In writing to the Chair of the Board of Directors of the Organization at IbexBOD@skiibex.com, who will in turn forward the Concern to the Board of Directors for review where appropriate.

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Concerns may be raised anonymously; provided, however, that any individual reporting his or her own violation shall not satisfy his/her obligation hereunder with a Concern raised anonymously.

IV. PROCEDURES FOR RECEIVING AND REVIEWING CONCERNS

Any club officer or club director receiving a Concern should contact the Board of Directors, who will coordinate further action. The Board of Directors will assess each Concern on a preliminary basis to determine to what extent an investigation into the Concern is required and will direct all aspects of the investigation of any Concern. All investigations will be conducted in a confidential and sensitive manner, so that information will be disclosed only as needed to facilitate review of the investigation materials or otherwise as required by law. You must cooperate as necessary in connection with any such investigation. In the event a Concern involves or implicates a member of the Board of Directors, the Director will promptly recuse himself or herself from the investigation and inform the Board of Directors in writing/email. The Board of Directors will investigate such Concern or appoint impartial attorneys to investigate the Concern.

V. RECORDS OF CONCERNS AND INVESTIGATION REPORTS

The Board of Directors will maintain a written record of all Concerns summarizing in reasonable detail for each Concern: the nature of the Concern (including any specific allegations made and the persons involved); the date of receipt of the Concern; the current status of any investigation into the Concern and information about such investigation (including the steps taken in the investigation, any factual findings, and the recommendations for corrective action); and any final resolution of the Concern. An update of this record will be distributed to the Board of Directors in advance of each regularly scheduled meeting.

VI. CONFIDENTIALITY

All Concerns received will be treated confidentially or anonymously, as applicable, to the extent reasonable and practicable under the circumstances.

VII. NO RETALIATION AGAINST WHISTLEBLOWERS

It is the Organization's policy to encourage the communication of bona fide Concerns relating to the lawful and ethical conduct of the Organization's business. It is also the policy of the Organization to protect those who communicate bona fide Concerns from any retaliation for such reporting. No adverse membership action may be taken and retaliation to that Organization member is strictly prohibited, including, without limitation, intimidation, harassment, discrimination, coercion, or otherwise, whether express or implied, against any director, officer, or volunteer of the Organization who in good faith reports any Concern or assists in an investigation of, or the fashioning or implementation of any corrective action or response made in connection with, any Concern. Any person who violates this prohibition against retaliation

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will be subject to appropriate disciplinary action, which may include termination of membership with the Organization.

VIII. POLICY DISTRIBUTION

A copy of this Policy will be distributed to each Covered Person promptly following the adoption of or amendments to this Policy, and at such time as a person becomes a Covered Person.

IX. POLICY ADOPTION AND OVERSIGHT

The Board of Directors is responsible for providing oversight of the adoption and implementation of, and compliance with this Policy. Only directors satisfying the definition of “independence” pursuant to applicable law are permitted to participate in any Board of Directors deliberations or vote on matters relating to this Policy.

This Whistleblower Policy was adopted by the Board of Directors on:

Draft: April 26, 2015
Revised/Reaffirmed: June 13, 2016
Reaffirmed: April 22, 2020
Reaffirmed: April 23, 2023

Jean Bagel_____

Pam Chiechi_____

Lynn Dean_____

Paula Hiller_____

Joe Kelley_____

Tom Lemanski_____

Suzanne Nagel_____

Amy Scattaglia_____

Linda Wagner_____

Sydney Whitley_____