

Brooklyn Track Club Association

Whistleblower Policy

1. Statement of Ethical Commitment

Brooklyn Track Club Association ("the Club" or "BKTCA" or "the Organization") expects all members, volunteers, and staff to uphold the highest standards of ethics, honesty, and integrity in all Club-related activities. This policy reflects our commitment to a safe, inclusive, and transparent environment where concerns can be raised without fear of retaliation. We are dedicated to fostering a culture of accountability and respect, both on and off the track.

2. Purpose

This Whistleblower Policy is designed to encourage and enable individuals to report concerns about misconduct, violations of law, or unethical behavior within the Club. It ensures that such concerns are addressed promptly and appropriately, while protecting the individual from retaliation.

3. Scope of Reportable Concerns

This policy applies to any good-faith report of suspected wrongdoing, including but not limited to:

- Financial mismanagement or fraud
- Harassment or discrimination
- Safety violations
- Conflicts of interest
- Violations of Club policies or applicable laws

4. Reporting Procedure

Concerns may be reported via email to the Board of Directors at:
board@brooklyntrackclub.org

Alternatively, individuals may report concerns directly to any Board Officer:

- President/Executive Director
- Board Chairperson

- Board Treasurer
- Board Secretary

Reports should include as much detail as possible, including dates, names, and any supporting documentation. While email is preferred, verbal reports are also acceptable. The Board will acknowledge receipt of the report within **seven business days**, when possible, especially if the report is not anonymous.

5. Confidentiality

All reports will be handled with the utmost confidentiality. The Club will make every effort to protect the identity of the whistleblower, consistent with the need to conduct a thorough investigation.

6. Good Faith Requirement

Reports must be made in good faith, with reasonable grounds for believing that a violation has occurred. Allegations found to be knowingly false or malicious will be treated as a serious offense and may result in disciplinary action.

7. No Retaliation

No member, volunteer, or staff person who reports a concern in good faith shall suffer retaliation, harassment, or adverse consequences. Retaliation may result in disciplinary measures including:

- Temporary suspension from Club activities
- Removal from leadership roles
- Expulsion from the Club

This protection is in accordance with **New York State Not-for-Profit Corporation Law § 715-b**, which prohibits retaliation against whistleblowers in nonprofit organizations.

8. Investigation Process

All reports will be reviewed by the full Board of Directors. The Board may designate one or more members to lead the investigation. The Board may also consult external advisors if necessary. Findings and any corrective actions will be documented and communicated as appropriate.

9. Financial Concerns

Reports involving financial misconduct, fraud, or accounting irregularities will be prioritized and may involve consultation with external legal or financial advisors to ensure proper resolution.

10. Annual Communication

This policy will be reviewed annually and shared with all members, staff and volunteers. The Club will include reminders in its annual meeting materials and onboarding communications.

By adopting this Whistleblower Policy, Brooklyn Track Club Association Inc. demonstrates its commitment to fostering a culture of integrity, transparency, and accountability, where concerns can be raised safely and addressed responsibly across all aspects of Club operations and governance.

Whistleblower Policy adopted on August 15, 2025.