



LOWER MERION SOCCER CLUB

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Policy on Suspected Misconduct, Dishonesty, Fraud, and Whistle-blower Protection

Lower Merion Soccer Club is committed to the highest possible standards of ethical, moral, and legal conduct. Consistent with this commitment, this policy aims to provide avenues for employees to raise concerns about suspected misconduct, dishonesty, and fraud and to provide reassurance that they will be protected from reprisals or victimization for whistle-blowing in good faith.

PROCEDURE

Reporting

Employees and any other person who has a concern relating to suspected misconduct, dishonesty or fraud may make a report. Lower Merion Soccer Club wants to hear of possible problems in these areas.

Concerns or suspected misconduct, dishonesty or fraud may be reported by an employee to LMSC President Biff Sturla at: **biff@lmsc.net** If the employee chooses to do so, he / she may instead contact LMSC Director Martin Rubenstein at **rubenstein@levybaldante.com** . The employee may request to set up a telephone conversation if he / she chooses.

Timing

The earlier a concern is expressed, the easier it is to take action.

Investigating the Concern

Following the receipt of any complaints submitted, the Board Members will investigate each matter so reported and take corrective and disciplinary actions where appropriate.

The Board members may enlist committee members, employees of the Club and/or outside legal, accounting or other advisors, as appropriate, to conduct any investigation of complaints regarding financial reporting, accounting, internal accounting controls, auditing matters, or any other form of misconduct, dishonesty, or fraud. In conducting any investigation, the Board Members shall use reasonable efforts to protect the confidentiality and anonymity of the complainant.

Further Information

The amount of contact between the complainant and the body investigating the concern will depend on the nature of the issue and the clarity of information provided. Further information may be sought from the complainant.

Report to Complainant

The complainant will be given the opportunity to receive follow-up on their concern within two weeks:

- Acknowledging that the concern was received;
- Indicating how the matter will be dealt with;
- Giving an estimate of the time that it will take for a final response;
- Telling them whether initial inquiries have been made; and
- Telling them whether further investigations will follow, and if not, why.

Information

Subject to legal constraints the complainant will receive information about the outcome of any investigations.

Document Retention

The Board Members shall retain as a part of the records of the Committee any such complaints or concerns for a period of at least seven years.

SAFEGUARDS

No Retaliation

No director, officer, or employee or other person who in good faith reports a violation shall suffer harassment, retaliation or adverse employment consequence. 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. This policy is intended to encourage and enable employees and others to raise concerns within the organization prior to seeking resolution outside the organization.

Additionally, no employee shall be adversely affected because they refuse to carry out a directive which, in fact, constitutes corporate fraud, or is a violation of state or federal law.

Confidentiality

Violations or suspected violations may be submitted on a confidential basis by the complainant or may be submitted anonymously. Reports of violations or suspected violations will be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation. Every effort will be made to protect the complainant's identity.

Anonymous Allegations

Employees are encouraged to put their names to allegations because appropriate follow-up questions and investigation may not be possible unless the source of the information is identified. Concerns expressed anonymously will be investigated, but consideration will be given to:

- The seriousness of the issue raised;
- The credibility of the concern; and
- The likelihood of confirming the allegation from attributable sources.

Acting in Good Faith

Anyone filing a complaint must be acting in good faith and have reasonable grounds for believing the information disclosed indicates misconduct, dishonesty, or fraud. 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.

DEFINITION OF TERMS

For purposes of this policy, the definition of misconduct, dishonesty, and fraud includes but is not limited to:

- Acts which are inconsistent with Lower Merion Soccer Club policy
- Theft or other misappropriation of Lower Merion Soccer Club assets
- Misstatements or other irregularities in Lower Merion Soccer Club records
- Incorrect financial reporting
- Misuse of Lower Merion Soccer Club resources
- Illegal activities
- Immoral activities
- Forgery or alteration of documents
- Any other form of fraud

Lower Merion Soccer Club reserves the right to modify or amend this policy at any time as it may deem necessary.