

Whistleblower Policy

General

Black Hawk County Gaming Association has a policy describing Ethical Conduct. The policy requires directors, officers and employees to observe high standards of ethics in their duties and responsibilities.

Reporting Responsibility

It is the responsibility of all directors, officers and employees to with the Ethical Conduct policy and to report violations or suspected violation in accordance with this Whistleblower Policy.

No Retaliation

No director, officer, or employee who in good faith reports a violation of the Ethical Conduct Policy 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 Whistleblower Policy is intended to encourage and enable employees and other to raise serious concerns within the organization prior to seeking resolution outside the organization.

Reporting Violations

Black Hawk County Gaming Association is an organization with an open-door policy and suggests that employees share their questions, concerns, suggestions, or complaints with someone who can address them properly. In most cases, an employee's supervisor is in the best position to address an area of concern. However, if you are not comfortable speaking with your supervisor or you are not satisfied with your supervisor's response, you are encouraged to speak with the board president.

Accounting and Auditing Matters

The Audit Committee of the board shall address all reported concerns or complaints regarding corporate accounting practices, internal controls or auditing.

Acting in Good Faith

Anyone filing a complaint concerning a violation of the Ethical Conduct Policy must be acting in good faith and have reasonable grounds for believing the information disclosed indicates an ethical 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.

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Confidentiality

Violations or suspected violations may be submitted on a confidential basis by the complainant or may be submitted anonymously. Reports or violations or suspected violations will be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation.