



CONDUCT AND ETHICS

Anti-Retaliation and Whistleblower Protection Policy

ADOPTED BY THE BOARD OF DIRECTORS

November 19, 2024

ORGANIZATION

Foosball Clubs USA Inc., a 501(c)(3) nonprofit

This is the adopted version of this policy. Find every FCUSA policy at
foosballclubsusa.com/policies. Questions are welcome at
admin@foosballclubsusa.com.

Foosball Clubs USA Inc.

Anti-Retaliation and Whistleblower Protection Policy

1. Purpose

The purpose of this policy is to protect employees and other individuals associated with Foosball Clubs USA Inc. from retaliation when they report misconduct, unethical behavior, or other violations of the organization's policies or legal requirements. This policy also ensures that individuals can raise concerns without fear of adverse consequences.

2. Scope

This policy applies to all employees, volunteers, and any other individuals associated with Foosball Clubs USA Inc.

3. Policy Statement

Foosball Clubs USA Inc. strictly prohibits retaliation against any individual who, in good faith, reports or participates in the investigation of misconduct, unethical behavior, or any other violations of the organization's policies or legal requirements. Retaliation includes, but is not limited to, any form of adverse action such as termination, demotion, suspension, harassment, or any other discriminatory behavior.

4. Whistleblower Protection

- **Right to Report:** All employees and volunteers have the right to report any misconduct, unethical behavior, or violations of the organization's policies or legal requirements without fear of retaliation.
- **How to Report:** Reports can be made verbally or in writing to any of the following:
 - Immediate supervisor or manager.
 - Human Resources Department.
 - Designated Whistleblower Protection Officer.
- **Confidentiality:** Reports will be handled with the utmost confidentiality to the extent possible, consistent with the need to conduct a thorough investigation. The identity of the whistleblower will be protected to the maximum extent possible.

5. Examples of Misconduct and Violations

Examples of misconduct and violations that should be reported include, but are not limited to:

- Fraud or financial misconduct.
- Violation of laws or regulations.
- Unsafe working conditions.
- Harassment or discrimination.
- Violation of the organization's policies or code of conduct.
- Any other unethical behavior or wrongdoing.

6. Investigation Process

- **Initial Review:** Upon receiving a report, the designated Whistleblower Protection Officer or Human Resources Department will conduct an initial review to determine the appropriate course of action.
- **Investigation:** A prompt, thorough, and impartial investigation will be conducted. This may include interviews with the whistleblower, the alleged wrongdoer, and any witnesses.
- **Documentation:** All findings and actions taken will be documented and kept in a confidential file.

7. Protection Against Retaliation

- **Assurance of Protection:** Foosball Clubs USA Inc. assures all employees and volunteers that they will be protected from retaliation for reporting misconduct, unethical behavior, or violations in good faith.
- **Prohibited Retaliatory Actions:** Retaliatory actions prohibited under this policy include, but are not limited to:
 - Termination or dismissal.
 - Demotion or reduction in salary.
 - Suspension or disciplinary action.
 - Harassment or intimidation.
 - Any other form of adverse employment action.

8. Reporting Retaliation

- **How to Report:** Any employee or volunteer who believes they have been subjected to retaliation for reporting misconduct or participating in an investigation should

report the matter immediately to the Human Resources Department or the designated Whistleblower Protection Officer.

- **Investigation:** Reports of retaliation will be investigated promptly, thoroughly, and impartially. Appropriate corrective action will be taken if retaliation is substantiated.

9. Training and Awareness

- **Training:** All employees and volunteers will receive training on the Anti-Retaliation and Whistleblower Protection Policy and procedures.
- **Awareness:** Information about this policy will be made available to all individuals associated with Foosball Clubs USA Inc.

10. Responsibilities

- **Employees and Volunteers:** Understand and comply with the Anti-Retaliation and Whistleblower Protection Policy. Report any instances of misconduct, violations, or retaliation.
- **Supervisors and Managers:** Ensure that the policy is communicated and enforced. Support individuals who report misconduct and participate in investigations as needed.
- **Human Resources Department:** Oversee the implementation of the policy. Conduct investigations and maintain confidentiality. Provide training and support.

11. Conclusion

Foosball Clubs USA Inc. is committed to maintaining a safe and ethical environment where employees and volunteers can report misconduct without fear of retaliation. By adhering to this Anti-Retaliation and Whistleblower Protection Policy, we can ensure that all individuals are protected and that any unethical behavior is addressed promptly and effectively.