

USTA NorCal Legal Compliance & Whistleblower Policy

USTA NorCal (“NorCal”) requires its Board members, officers, and employees to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. As representatives of NorCal, we must practice honesty and integrity in fulfilling our responsibilities and comply with all applicable laws and regulations.

It is the responsibility of all Board members, officers, and employees to report concerns about legal compliance, and/or concerns regarding compliance with the NorCal Bylaws. And, all organization members and individual members of NorCal are strongly encouraged to report such concerns.

Generally, compliance concerns should be directed to the Executive Director, General Counsel, and/or one or more of NorCal’s [officers](#) (President, Vice President, Secretary, Treasurer, or Delegate). If the concern(s) relate to those officers, the concern should be raised any other [Board Member](#). Concerns may also be reported to USTA National pursuant to its [Reporting Fraudulent Activities and/or Unethical Behavior – Whistleblower Hotline policy](#).

NorCal needs and wants to be made aware of such concerns in order to ensure its legal compliance. Consistently, NorCal will not tolerate any form of retaliation against any person for raising legal compliance concerns in good faith (“whistleblower”). Please note that a whistleblower is protected from retaliation regardless of whether any party disagrees with their concern, and regardless of whether an investigation substantiates the concern, as long as the concern was raised in good faith (e.g., not deliberately dishonest). The definition of a retaliatory act broadly encompasses any form of direct or indirect retaliation that would tend to dissuade a reasonable person from raising legal compliance concerns. Anyone experiencing any form of retaliation for raising a legal compliance concern is encouraged to notify one or more of the same officers/Board members referred to in the third paragraph of this policy.

When legal compliance concerns are raised pursuant to this policy, the Board (disinterested members only, with others recused) will form a committee or group of disinterested members of the Board of Directors, and/or disinterested NorCal members outside of the Board, to review the matter and determine whether an investigation is warranted to ensure legal compliance. Information concerning the matter will be kept as confidential as possible (i.e., shared only on a need-to-know basis). The committee will ensure that NorCal promptly conducts any appropriate investigation, with the results of the investigation being reported to the disinterested members of the Board. All Board members, officers, and employees are required to cooperate with any such investigation. The disinterested members of the Board will ensure that NorCal takes any appropriate corrective actions based upon the facts. The parties will be cautioned in writing that no retaliation or interference with the investigation will be tolerated.