



Casper Amateur Hockey Club Business Policy Manual September 2017

Protection of Whistleblower Policy

1. Retaliation against any Director, employee, skater, parent, volunteer, agent, contractor or supporter of Casper Amateur Hockey Club (CAHC) who raises concerns regarding potential violation of the law or of CAHC's standards of conduct is prohibited. Retaliation against any employee for proper use of corporate compliance reporting mechanisms is cause for immediate and appropriate disciplinary actions.
2. No Director, employee, contractor, or agent of CAHC may discharge, demote, suspend, threaten, harass, or in any other manner knowingly and intentionally discriminate against any employee of CAHC in the terms and conditions of employment because of any act done by the employee:
 - a. To provide information, cause information to be provided, or otherwise assist in an investigation regarding any conduct which the employee reasonably believes constitutes a violation of state or federal law applicable to CAHC or CAHC's policies and procedures, when the information or assistance is provided to, or the investigation is conducted by:
 - i. any state or federal regulatory or law enforcement agency;
 - ii. any member of Congress or state legislature or any committee thereof; or
 - iii. a person with supervisory authority over the employee or such other person working for the corporation who has the authority to investigate, discover, or terminate misconduct (e.g., a corporate compliance officer); or
 - b. To file, cause to be filed, testify, participate in or otherwise assist in a proceeding filed or about to be filed (without the knowledge of the employer) relating to an alleged violation of state or federal law applicable to the corporation.

Contemporaneous Recording Policy

It shall be the policy of the Board of Directors of Casper Amateur Hockey Club that:

The minutes and other documentation relating to each meeting of its Board of Directors and of any committees with Board-delegated powers shall be prepared before the later to occur of:

- The next meeting of the Board or committee; or
- 60 days after the date of the meeting for which the minutes are prepared.

In addition, such Board or committee must approve the minutes and/or other documentation within a reasonable time after their preparation. The minutes will be posted on the club website at www.casperhockey.com.

Document Retention Policy

This policy represents Casper Amateur Hockey Club's (CAHC) policy regarding retention and disposal of records and the retention and disposal of electronic documents.

Attached as Appendix A is a record retention schedule that is approved as the initial maintenance, retention, and disposal schedule for physical records of CAHC, and the retention and disposal of electronic documents. The President is the individual in charge of the administration of this policy and the implementation of processes and procedures to ensure that this policy is followed. The President is also authorized to make modifications to the record retention schedule from time to time to ensure that it is in compliance with local, state, and federal laws and includes the appropriate document and record categories for CAHC; monitor local, state, and federal laws affecting record retention; annually review the record retention and disposal program; and monitor compliance with this policy.

In the event that CAHC is served with any subpoena or request for documents, or any employee becomes aware of a governmental investigation or audit concerning the CAHC, or the commencement of any litigation against or concerning CAHC, such employee shall inform the President and any further disposal of documents shall be suspended until such time as the President, with the advice of counsel, determines otherwise. The President shall take such steps as is necessary to promptly inform all staff of any suspension in the further disposal of documents.

This policy applies to all physical records generated in the course of CAHC's operation, including both original documents and reproductions. It also applies to the electronic documents described above.

Document Retention Policy Appendix A

PURPOSE

In accordance with the Sarbanes-Oxley Act, which makes it a crime to alter, cover up, falsify, or destroy any document with the intent of impeding or obstructing any official proceeding, this policy provides for the systematic review, retention, and destruction of documents received or created by CAHC in connection with the transaction of organization business. This policy covers all records and documents, regardless of physical form and including items in electronic form, contains guidelines for how long certain documents should be kept, and how records should be destroyed (unless under legal hold). The policy is designed to ensure compliance with federal and state laws and regulations, to eliminate accidental or innocent destruction of records, and to facilitate CAHC's operations by promoting efficiency and freeing up valuable storage space.

DOCUMENT RETENTION

CAHC follows the document retention procedures outlined below. Documents that are not listed, but are substantially similar to those listed in the schedule, will be retained for the appropriate length of time.

CORPORATE RECORDS

Annual Reports to Secretary of State/Attorney General	Permanent
Articles of Incorporation	Permanent
Board Meeting and Board Committee Minutes	Permanent
Board Policies/Resolutions	Permanent
Bylaws	Permanent
Construction Documents	Permanent
Fixed Asset Records	Permanent
IRS Application for Tax-Exempt Status (form 1023)	Permanent
IRS Determination Letter	Permanent
State Sales Tax Exempt Letter	Permanent
Contracts (after expiration)	7 years
Correspondence (general)	3 years

ACCOUNTING AND CORPORATE TAX RECORDS

Annual Audits and Financial Statements	Permanent
Depreciation Schedules	Permanent
IRS Form 990 Tax Return	Permanent
General Ledgers	7 years
Business Expense Records	7 years
IRS Forms 1099	7 years
Journal Entries	7 years
Invoices	7 years
Sales Records	5 years
Petty Cash Vouchers	3 years
Cash Receipts	3 years
Credit Card Receipts	3 years

BANK RECORDS

Check Registers	7 years
Bank Deposit Slips	7 years
Bank Statements and Reconciliation	7 years
Electronic Fund Transfer Documents	7 years

PAYROLL AND EMPLOYMENT RECORDS

Payroll Registers	Permanent
State Unemployment Tax Records	Permanent
Earnings Records	7 years
Garnishment Records	7 years
Payroll Tax Returns	7 years
W-2 Statements	7 years

EMPLOYEE RECORDS

Employment and Termination Agreements	Permanent
Retirement and Pension Plan Documents	Permanent
Records Relating to Promotion, Demotion, or Discharge	7 years after termination
Accident Reports and Worker's Compensation Records	5 years
Salary Schedules	5 years
Employment Applications	3 years
I-9 Forms	3 years after termination
Time Cards	2 years

DONOR AND GRANT RECORDS

Donor Records and Acknowledgment Letters	7 years
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Grant Applications and Contracts

7 years after completion

LEGAL, INSURANCE, AND SAFETY RECORDS

Appraisals	Permanent
Copyright Registrations	Permanent
Environmental Studies	Permanent
Insurance Policies	Permanent
Real Estate Documents	Permanent
Stock and Bond Records	Permanent
Trademark Registrations	Permanent
Leases	6 years after expiration
OSHA Documents	5 years
General Contracts	3 years after termination

ELECTRONIC DOCUMENTS AND RECORDS

Electronic documents will be retained as if they were paper documents. Therefore, any electronic files, including records of donations made online, that fall into one of the document types on the above schedule will be maintained for the appropriate amount of time. If a user has sufficient reason to keep an email message, the message should be printed in hard copy and kept in the appropriate file or moved to an "archive" computer file folder. Backup and recovery methods will be tested on a regular basis.

EMERGENCY PLANNING

CAHC records will be stored in a safe, secure, and accessible manner. Documents and financial files that are essential to keeping CAHC operating in an emergency will be duplicated or backed up at least every week and maintained off-site.

DOCUMENT DESTRUCTION

CAHC's President is responsible for the ongoing process of identifying its records, which have met the required retention period, and overseeing their destruction. Destruction of financial and personnel-related documents will be accomplished by shredding.

Document destruction will be suspended immediately, upon any indication of an official investigation or when a lawsuit is filed or appears imminent. Destruction will be reinstated upon conclusion of the investigation or lawsuit.

COMPLIANCE

Failure on the part of employees to follow this policy can result in possible civil and criminal sanctions against CAHC and its employees and possible disciplinary action against responsible individuals. The President and Finance Committee Chairperson will periodically review these procedures with legal counsel or the organization's certified public accountant to ensure that they are in compliance with new or revised regulations.

Form 990 Commitment Policy

It shall be the policy of the Board of Directors of Casper Amateur Hockey Club (CAHC) that:

All members of the Board of Directors shall be provided with a reasonable opportunity to review and comment to the Executive Committee on the Form 990 of CAHC before it is filed with the Internal Revenue Service.

Executive Committee of CAHC shall provide members of the Board of Directors with an overview of the highlight of the Form 990 filed on behalf of CAHC at the next regularly scheduled Board meeting following the filing of the Form 990.

Conflict of Interest Policy

1. **Purpose.** The Board of the Casper Amateur Hockey Club ("CAHC") recognizes that as a public entity, it is essential that its Directors and employees conduct themselves with the highest degree of personal and professional trust and integrity.

While it is recognized and understood that Directors and employees of CAHC will act with integrity and in the best interests of CAHC, given the day-to-day involvement of the Directors with many financial, businesses, investments, and other activities apart from their service on the CAHC Board, the occasion for conflict may inevitably arise. It is the position of the Board that in the interest of good governance, protecting the interests of the CAHC, transparency in all discussions, and the importance of identifying and declaring potential conflicts, there should be a written policy and procedure relating to such potential conflicts of interest. This policy is therefore adopted, as signified below.

2. **General Rules.**
 - a. Directors and employees shall conduct all financial, business, and other activities of CAHC in full compliance with applicable laws, rules and regulations, and should exercise their own good judgment in all manners.

- b. Subject to applicable law, Directors and employees shall maintain the confidentiality of all CAHC information entrusted to them except in circumstances where they reasonably believe that disclosure is required or permitted. Confidential information coming to CAHC shall not be used in violation of any applicable law, nor shall it be transmitted or communicated by any Director or employee beyond the purpose for which it was obtained.
 - c. Full and early disclosure of a real or potential conflict is essential to assuring any issues are addressed appropriately. Accordingly, any Director or employee shall report any potential conflict as soon as it appears.
 - d. Since conflicts may not always be clear-cut, a Director or employee shall report all transactions or relationships that reasonably could be expected to give rise to a conflict, erring on the side of disclosure.
 - e. In connection with any actual or potential conflict of interest, a Director or employee must disclose the existence and nature of his or her financial, competitive, or other interest and all relevant material facts to the Board, as well as an explanation of the reasons for the potential conflict.
 - f. A Director shall promptly inform the Board of any real or potential conflict, and an employee shall so inform the President.
 - g. If a Director or employee (or to their knowledge an immediate family member or person with whom they have a close personal or financial relationship) has a direct or indirect financial interest in a matter before the CAHC, or is a Director or an Executive Officer of a company that is doing or potentially will do business with the CAHC, the Director or employee shall disclose such interest and shall not participate on behalf of the CAHC in any discussions or decisions concerning the terms of the business relationship or Board discussions relating thereto, unless in an open meeting and when specifically requested to do so by the Board.
3. **Procedures.** The following procedures shall apply to all conflicts or interest or potential or perceived conflict of interest situations:
- a. A Director or employee has the affirmative duty and obligation to declare a conflict of interest as soon as it appears. Upon declaring such a conflict, the Director or employee shall reclude himself or herself from participating in discussion of the matter, and shall not participate in any decision or vote on the matter.
 - b. A Director or employee who learns of a potential conflict, or of a set of circumstances which may not then constitute a real or potential conflict but which they feel should be disclosed, shall follow the process to assess whether a conflict of interest exist
 - i. The Director or employee shall fully disclose the circumstances and the material facts surrounding it.
 - ii. After disclosure of the facts and circumstances by the Director, or if the issue has been independently raised, the Board shall ascertain and review the material facts, and discuss the relevant circumstances with the affected Director or employee.
 - iii. The remaining Directors by their vote shall then decide if a conflict of interests exists. The potentially conflicted Director shall physically remove himself or herself from the Board's consideration, debate, and decision while a final determination of a conflict of interest is discussed and voted upon.
 - iv. In the case of an employee, the Executive Committee shall decide if a conflict of interest exists. All such situations concerning employees shall be reported to the Board at its next regularly scheduled meeting.
 - c. Should a conflict has been determined to exist:
 - i. An affected Director may, should he/she choose to do so, make a presentation to the Board relating to the matter as would any other member of the public, but he/she shall not sit with the Board or participate with the Board during the presentation of, discussion of, or vote on the transaction or arrangement that gives rise to the conflict of interest.
 - ii. The chairperson of the Board shall, if it is deemed practical, appropriate, and necessary under the circumstances of the matter, giving rise to the conflict, appoint a disinterested person or committee to investigate alternatives to the proposed transaction or arrangement.
 - iii. If the circumstances of the matter warrant such action, and the transaction is a sole source proposal and not otherwise open to other parties, after exercising due diligence the Board shall determine whether the CAHC can obtain a more advantageous transaction or arrangement with reasonable efforts from a person or entity that would not give rise to a conflict of interest.
 - iv. If a more advantageous transaction or arrangement is not reasonably attainable or practical under circumstances that would not give rise to a conflict of interest, the Board may determine by

a majority vote of the disinterested Directors whether the transaction or arrangement is in the CAHC's best interest and whether the transaction is fair and reasonable to the CAHC and shall make its decision as to whether to enter into the transaction or arrangement in conformity with such determination.

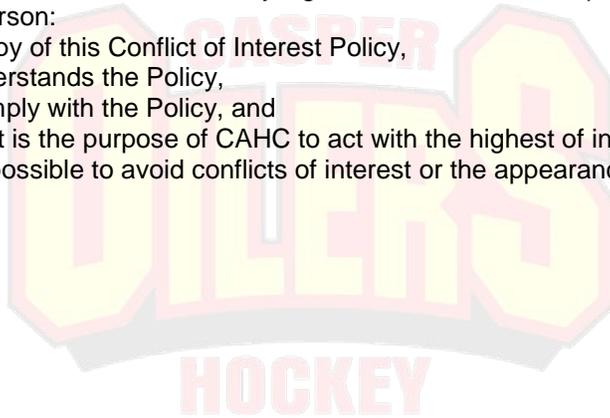
- v. In the case of an employee determined to have a conflict, the employee shall not participate in any matter regarding the proposed transaction or arrangement or discuss it with any Director or the President until after any Board decision is made regarding the proposed transaction or arrangement.
- vi. In the case of an employee determined to have a conflict, should the Board ultimately undertake the transaction or arrangement, the employee shall be permitted to perform their work-related duties as it relates to the transaction or arrangement.

4. **Records of Proceedings.** As it relates to conflicts, the minutes of the Board shall contain:

- a. The names of persons who disclosed or otherwise were found to have an actual or possible conflict of interest, the nature of the conflict, any action taken to determine whether a conflict of interest was present, and the Board's determination as to whether a conflict of interest in fact existed.
- b. The names of all persons who were present for any discussion and votes relating to the transaction or arrangement, the content of the discussion, including any alternatives to the proposed transaction or arrangement if warranted, and a record of any votes taken in connection therewith, noting specifically any Director who abstains.

5. **Annual Statements.** Each Director shall annually sign a statement, to be kept with the records of the CAHC, which affirms that such person:

- a. has received a copy of this Conflict of Interest Policy,
- b. has read and understands the Policy,
- c. has agreed to comply with the Policy, and
- d. understands that it is the purpose of CAHC to act with the highest of integrity and full transparency, and to the fullest extent possible to avoid conflicts of interest or the appearance of a conflict.





Casper Amateur Hockey Club Board Member Potential Conflict of Interest Disclosure and Acknowledgment Statement

Please list any organization (i.e. any corporation, sole proprietorship, business trust, limited liability company, association or similar organization) of which you or any immediate family members are a 10% or greater shareholder, or in which you or any immediate family member are an owner, director, officer, partner, or trustee.

Organization	Position	Percent Ownership

Please list any relationship you or any immediate family member has with any business, industry, or entity connected to or associated with the work of the Wyoming Infrastructure Authority (i.e. employee, owner, shareholder, contractor, or agent)

Name	Relationship to you	Entity and their relationship to you

Are you otherwise involved in any business that has the potential to engage in transactions with Casper Amateur Hockey Club? If yes, please describe.

Are you related to anyone employed or affiliated with the Casper Amateur Hockey Club? If yes, please explain.

Are you involved in any business that has the potential to engage in transactions with anyone employed at or affiliated with Casper Amateur Hockey Club? If yes, please explain.

Are you affiliated in any way with any public or governmental entity that might service in some oversight capacity to Casper Amateur Hockey Club, or that may be overseen by Casper Amateur Hockey Club? If yes, please explain.

Please describe any situation you feel has the potential to create a conflict of interest for you according to the policies and procedures of Casper Amateur Hockey Club.

I do acknowledge, swear, and affirm as follows:

- It is the purpose of the Casper Amateur Hockey Club to act with the highest of integrity and full transparency and to the fullest extent possible to avoid conflicts of interest or the appearance of any conflict whatsoever.
- Casper Amateur Hockey Club requires disclosure of certain interests to be made on an annual basis, and that I will immediately disclose to the full Board any conflict of interest or potential conflict interest that may develop during my service on the Board.
- I have received, read, and understand the Conflict of Interest policies and Bylaws of the Casper Amateur Hockey Club, and agree to fully comply with them.
- The statements contained in this Potential Conflict of Interest Statement are true, accurate, and complete to the best of my knowledge and belief.

Printed name: _____

Signature: _____

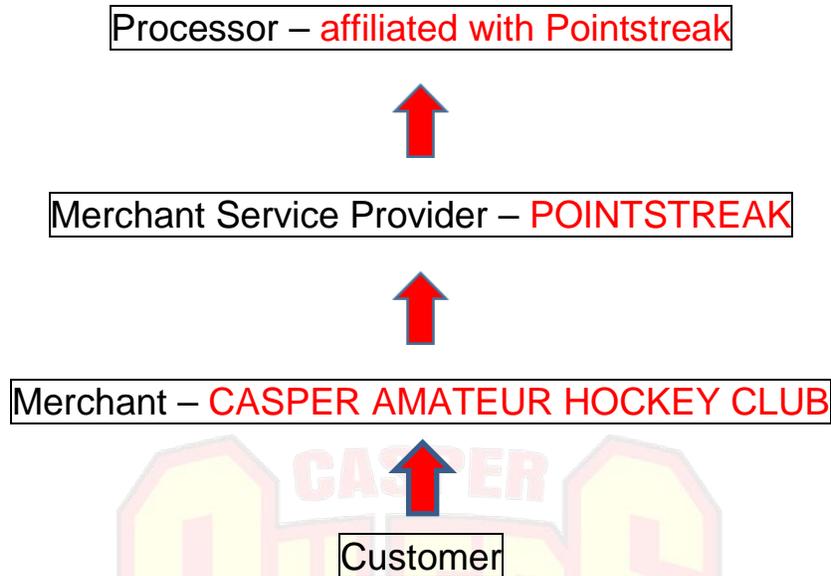
Date: _____

Payment Processing Security and Compliance Policy

Introduction

Since CAHC receives online payments, there are security and compliance issues that must be managed. The Club is considered a **merchant**, which is the bottom level in the Payment Card Industry (PCI), as the Club receives payments from the credit card customer (families making payments on accounts, purchases at events, etc).

For payments on Pointstreak accounts, the payments are processed via a processor affiliated with the Pointstreak online registration program. The levels the Club is involved in are shown below (providers are in red):



Merchants are divided into levels determined by how many and what type of annual transactions they do. Different levels require different levels of security and compliance measures. For online payments processed through the processor, CAHC is considered a **LEVEL 4 Merchant**, which means the Club processes fewer than 20,000 transactions per year. As a Level 4 merchant, the Club is required to do an **annual PCI Self-Assessment Questionnaire** (done through TransArmour Solution – PCI Rapid Comply) as required by the processor. In addition, the Club should do a **Quarterly Network Scan** through an Approved Scanning Vendor (ASV). These compliance requirements will be the responsibility of the CAHC President, Treasurer, and Bookkeeper.

Informational Security

Informational security is, therefore, a necessity in the current technologically driven world. There are several levels of information that require differing levels of security. They are:

1. **Confidential** – Confidential information requires the highest level of security. This is information that, if compromised, could seriously and adversely affect both an organization and its customers. Customer credit card information is confidential information.
2. **Sensitive** – Sensitive information is the next level of information. Unauthorized disclosure of sensitive information still has serious consequences, but less widespread than confidential. An example of sensitive information would be internal audit reports.
3. **Private** – Private information is for use within a specific organization. This is information that may be disseminated within the organization. It is probably not harmful if spread outside the specific organization, but also not particularly useful to those outside. Organizational policies are an example of this type of information.
4. **Public** – Public information encompasses all other information. This may be widely disseminated, but should still be authorized by the specific organization. An example of this would be a brochure or website.

Given the access CAHC has to a wide variety of information, it is up to the Club to provide a process to protect the integrity, confidentiality, and availability of the customer (skater, family, etc.) information that is provided.

Informational **integrity** is making sure information does not improperly change. The Club's protection for this is to limit the personnel that will have access to such information. **Confidentiality** ensures that access to information is on a need-to-know basis only. Password protecting computers or other electronics so that only authorized personnel can get personal

information is a necessity for security in this area. Finally, **availability** ensures that limited information is protected by firewalls and system backups.

Failure to Comply

Failure by an organization to comply with industry standards can result in several consequences, including, but not limited to regulatory fines and penalties, increased processing costs related to high-risk status, and loss of customer confidence and loyalty.

CAHC Compliance Measures

To meet the compliance and security requirements, CAHC has adopted the following guidelines for the Club's protection and that of its customers.

SECURITY GUIDELINES FOR COMPUTER USE, TECHNOLOGY USE, AND CREDIT CARD TRANSACTIONS

The Club will:

1. Maintain a list of parties approved to use business/technology devices and transact credit card entries. Emphasis should be on the confidentiality of credit information and emails. It is specifically forbidden to share credit card transaction information by email or insecure technology.
2. Limit and specify locations where CAHC business/technology devices may be used to transact business.
3. Maintain antivirus programs on each device and keep antivirus logs to be reviewed yearly.
4. Password-protect all devices and software and severely limit password access.
5. If devices and/or credit transactions are breached, the following procedures should be followed:
 - a. Immediately notify the CAHC President that a breach has occurred
 - b. CAHC President or CAHC Treasurer will notify the appropriate law enforcement, merchant banks, and card associations.
 - i. Casper Police Dept.
 - ii. Processor (for payments received through Pointstreak accounts)
 - iii. Hilltop National Bank
 - c. Formal notification of customers affected should be made in a timely manner by the CAHC President or the CAHC Treasurer and remedy made by any possible means available.
6. Have this sheet available near all authorized computers/devices. Require that each authorized person read, sign, and date the Payment Processing Security and Compliance Policy Authorized Users log (Club or Event) to ensure their understanding of the importance of their position as an authorized user.

The Club will also follow and comply with any requirements set by Intuit which is the merchant service provider used for credit card transactions received other than through Pointstreak/Processor.

