

## WHISTLEBLOWER POLICY AND PROCEDURES

1. Policy  
SOCIETY Officers, members of the Board of Directors, other volunteer leaders, and all staff members should observe high standards of business and personal ethics in the conduct of their SOCIETY duties and responsibilities. Staff members and representatives of the organization must practice honesty and integrity in fulfilling their SOCIETY responsibilities and comply with all applicable laws and regulations.
2. Reporting Responsibility  
Each SOCIETY Officer, member of the Board of Directors, volunteer leader, or staff member of the SOCIETY has an obligation to report in accordance with this Whistleblower Policy the following (hereinafter collectively referred to as Concerns):
  - a. questionable or improper accounting or auditing matters, and
  - b. violations and suspected violations of the law
3. Role of Executive Committee  
All reported Concerns will be forwarded to the Executive Committee in accordance with the procedures set forth herein. The Executive Committee shall be responsible for investigating, and making appropriate recommendations to the Board of Directors, with respect to all reported Concerns.
4. Policy of No Retaliation  
This Whistleblower Policy is intended to encourage and enable SOCIETY Officers, members of the Board of Directors, other volunteer leaders, and all staff members to raise Concerns within the SOCIETY for investigation and appropriate action. With this goal in mind, no SOCIETY Officer, member of the Board of Directors, other volunteer leader, or staff member who, in good faith, reports a Concern shall be subject to retaliation or, in the case of a staff member, adverse employment consequences. Moreover, a volunteer or staff member who retaliates against someone who has reported a Concern in good faith is subject to discipline up to and including dismissal from the volunteer position or termination of employment.
5. Procedures for Reporting Concerns
  - a. Staff members should first discuss their Concern with their immediate supervisor. If, after speaking with his or her supervisor, the individual continues to have reasonable grounds to believe the Concern is valid, the individual should report the Concern to the Human Resources Manager. In addition, if the individual is uncomfortable speaking with his or her supervisor, or the supervisor is a subject of the Concern, the individual should report his or her concern directly to the Human Resources Manager or Executive Director. If the Concern was reported verbally to the Human Resources Manager, the reporting individual, with assistance from the Human Resources Manager, shall reduce the Concern to writing. The Human Resources Manager is required to promptly report the Concern to the President of the SOCIETY in the capacity as Chair of the Executive Committee, which has specific and exclusive responsibility to investigate all Concerns. If the Human Resources Manager, for any reason, does not promptly forward the Concern to the Executive Committee, the reporting individual should directly report the Concern to the President of the SOCIETY in the capacity as Chair of the Executive Committee. Concerns may also be submitted anonymously. Such anonymous Concerns should be in writing and sent directly to the President of the SOCIETY in the capacity as Chair of the Executive Committee. If a member of the Executive Committee is a subject of any Concern, then that member of the Executive Committee shall be excluded from consideration of that Concern.
  - b. SOCIETY Officers, members of the Board of Directors, and other volunteer leaders should submit Concerns in writing directly to the President of the SOCIETY in the capacity as Chair of the Executive Committee.
  - c. If the Concern involves the person to whom the action would normally be reported, the person with the Concern has the right to report the Concern to another person with authority.
6. Handling of Reported Violations  
The Executive Committee shall address all reported Concerns. The Chair of the Executive Committee shall immediately notify the Executive Committee, the Executive Director, and Director of Operations of any such report. The Chair of the Executive Committee will notify the sender and acknowledge receipt of the Concern within five business days, if possible. It will not

be possible to acknowledge receipt of anonymously submitted Concerns. All reports will be promptly investigated by the Executive Committee, and appropriate corrective action will be recommended to the Board of Directors, if warranted by the investigation. In addition, action taken must include a conclusion and/or follow-up with the complainant for complete closure of the Concern. The Executive Committee has the authority to allocate budgeted funds to retain outside legal counsel, accountants, private investigators, or other resource deemed necessary to conduct a full and complete investigation of the allegations.

7. Acting in Good Faith

Anyone reporting a Concern must act in good faith and have reasonable grounds for believing the information disclosed indicates an improper accounting or auditing practice, or a violation of the law. The act of making allegations that prove to be unsubstantiated, and that prove to have been made maliciously, recklessly, or with the foreknowledge that the allegations are false, will be viewed as a serious disciplinary offense and may result in discipline, up to and including dismissal from the volunteer position or termination of employment. Such conduct may also give rise to other actions, including civil lawsuits.

8. Confidentiality

Reports of Concerns, and investigation pertaining thereto, shall be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation. Disclosure of reports of Concerns to individuals not involved in the investigation will be viewed as a serious disciplinary offense and may result in discipline, up to and including dismissal from a volunteer position or termination of employment. Such conduct may also give rise to other actions, including civil lawsuits.