

THE HONOR  SOCIETY OF  
PHI KAPPA PHI

## WHISTLEBLOWER POLICY & PROCEDURES

### INTRODUCTION

The Society is committed to lawful and ethical behavior in all of its activities and requires all directors, employees and volunteers (“Society Representatives”) to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. Each Society Representative must fulfill his/her responsibilities honestly, with integrity and in compliance with applicable laws and policies.

Every Society Representative is responsible for implementing this policy. Every Society Representative shall cooperate with the investigation of any good faith suspicion of illegal, unethical or inappropriate activity.

Any Society Representative who in good faith reports any suspicion of illegal, unethical or inappropriate activity shall not be subject to harassment, threats, discrimination, adverse consequences or retaliation.

### OBJECTIVES

The objectives of the Society’s Whistleblower Policy and Procedures are to establish a method to:

- Prevent or detect and correct improper activities;
- Encourage Society Representatives to report suspicion of illegal, unethical or inappropriate activity;
- Ensure the receipt, documentation, retention of records and resolution of reports received under this policy; and
- Protect Society Representatives who report suspicion of illegal, unethical or inappropriate activity from harassment, threats, discrimination, adverse consequences or retaliation.

### REPORTING RESPONSIBILITY

Every Society Representative has an obligation to report suspicion of illegal, unethical or inappropriate activity by the Society or by any Society Representative. The following are examples of matters which should be reported:

- False or misleading information on the Society's financial documents, grant reports, tax returns or other public documents;
- False information to or withholding material information from the Society's auditors, accountants, lawyers, directors or other representatives responsible for ensuring compliance with fiscal and legal responsibilities;
- Misappropriation of Society funds or Society property;
- Material violation of Society policy including but not limited to confidentiality, conflict of interest, whistleblower, ethics and document retention;
- Discrimination based on race, gender, sexual orientation, ethnicity or disability; and
- Facilitating or concealing any of the above or similar activities.

#### **REPORTING PROCEDURES FOR EMPLOYEES**

Whenever possible, an employee should seek to resolve concerns by reporting suspicions directly to his/her supervisor then to the next level of management as needed until matters are satisfactorily resolved.

If any employee in good faith believes that a policy or practice the Society or of a Society Representative is illegal, unethical or inappropriate, the employee shall report the concern in writing to the employee's immediate supervisor, the Associate Executive Director/CFO, or the Executive Director immediately.

If the employee feels uncomfortable reporting the concern to the employee's immediate supervisor, the Associate Executive Director/CFO and the Executive Director or if the employee does not believe the report was properly addressed, the employee shall report the concern in writing to the Society President.

#### **REPORTING PROCEDURES FOR DIRECTORS AND OTHER VOLUNTEERS**

If any director or other volunteer in good faith believes that a policy or practice of the Society or of a Society Representative is illegal, unethical or inappropriate, the director or other volunteer shall report the concern in writing to the Society President, Executive Director or Associate Executive Director/CFO.

If the director or other volunteer is not comfortable reporting the suspicion to the Society President, Executive Director or Associate Executive Director or if he/she does not believe the concern was properly addressed, the director or other volunteer shall report the concern in writing to any member of the Board of Directors.

Reports may be submitted anonymously to the Society President, Executive Director or Associate Executive Director/CFO; however, in order for a proper investigation to be conducted of an anonymous complaint, the complaint must contain specific information.

### **PROCEDURES FOR HANDLING REPORTS**

The Society will investigate all reports filed in accordance with this policy with due care and promptness. Matters reported internally without initial resolution will be investigated by the Society President, Executive Director or Associate Executive Director/CFO to determine if the allegations are verifiable, whether the policy or practice is a violation of applicable laws or policies and what actions are necessary to correct the concern.

The Society will issue a full report of each concern filed under this policy to its Board of Directors at the Board meeting following the conclusion of the investigation. The Board of Directors may conduct further investigation upon receiving the report.

The Society President, Executive Director or Associate Executive Director/CFO shall have the authority to obtain outside legal counsel, accountants, private investigators and any other resources deemed necessary to conduct a full and complete investigation of the allegations.

### **ACTING IN GOOD FAITH**

Anyone reporting a concern must act in good faith and have reasonable grounds for believing the matter raised is illegal, unethical or inappropriate. Anyone who maliciously, recklessly, negligently or with the foreknowledge reports false information shall be subject to disciplinary action which may include termination of employment or dismissal from a volunteer position. Additionally, the Society may take any legal action appropriate or necessary to protect of the Society, its reputation or resources, employees, directors or other volunteers.

### **CONFIDENTIALITY**

Reports of concerns and investigations pertaining thereto shall be kept confidential to the extent possible; however, where necessary to conduct an adequate investigation, the Society reserves to disclose any information concerning the investigation.

Disclosure of information relating to an investigation under this policy by Society employees, directors or other volunteers involved with an investigation to individuals not involved in the investigation may subject the individual to disciplinary action which may include termination of employment or dismissal from a volunteer position. Additionally, the Society may take any legal action appropriate or necessary to protect the Society, its reputation or resources, employees, directors or other volunteers.

*Adopted October 2008*

**ACKNOWLEDGEMENT OF RECEIPT**  
OF THE HONOR SOCIETY OF PHI KAPPA PHI'S  
WHISTLEBLOWER POLICY

I, \_\_\_\_\_, hereby certify that:

1. I have received a copy of the Whistleblower Policy;
2. I have read and understand the policy; and
3. I agree to comply with the policy.

Except as described below, I am not now nor at any time during the past year have I been:

1. A participant, directly or indirectly, in any arrangement, agreement, investment or other activity with any vendor, supplier, or other party doing business with the Society which has resulted or could result in a personal benefit to me or any member of my immediate family.
2. A recipient, directly or indirectly, of any salary payments or loans or gifts of any kind or any free service or discounts or other fees from or on behalf of any person or organization engaged in any transaction with the Society.

Any exceptions to 1 or 2 above are stated below with a full description of the transactions and of any interest, whether direct or indirect, which I have or have had during the past year.

Please list any exceptions to the statements above: \_\_\_\_\_

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Please list any interests, arrangements, agreements or investments which could give rise to a conflict:

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Date: \_\_\_\_\_

Signature: \_\_\_\_\_

Printed Name: \_\_\_\_\_