WHISTLERBLOWER POLICY & PROCEDURES for BOARD MEMBERS

Document Information

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PURPOSE

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
- 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, ethnicity, color, religion, sex (including gender identity, sexual orientation, and pregnancy), national origin, age (40 or older), disability, genetic information, or other classifications as required by law.
- Retaliation against a person because he or she complained about discrimination, filed a charge of discrimination, or participated in an employment discrimination investigation or lawsuit.
- Facilitating or concealing any of the above or similar activities.

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 Executive Director.

If the director or other volunteer is not comfortable reporting the suspicion to the 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 the chair of the Executive Committee of the Board of Directors.

Reports may be submitted anonymously to the Executive Director or Executive Committee; 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 will be investigated by the receiving entity (Executive Director or Executive Committee) 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 receiving entity (Executive Director or Executive Committee) has 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 foreknowledge reports false information shall be subject to disciplinary action which may include dismissal from a volunteer position. Additionally, when appropriate due to persons acting in bad faith, the Society may take any legal action necessary to protect 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 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.