Grant Professionals Association ("GPA") is committed to maintaining the highest standards of ethical, moral, and legal business conduct. GPA will investigate any suspected fraudulent or dishonest use or misuse of GPA's resources or property by staff, board members, consultants, or volunteers. This conduct might include outright theft (of equipment or cash), fraudulent expense reports, misstatements of any accounts to any manager or to GPA's auditors, or even an individual's conflict of interest that results in financial harm to GPA. GPA is further dedicated to acting in good faith with those staff, board members, consultants, and volunteers who raise concerns regarding incorrect financial reporting, unlawful activity, or otherwise improper conduct (i.e. to act as a "whistleblower").

Background

This Whistleblower Policy aims to provide staff, board members, consultants, and volunteers with an avenue for raising such concerns, and to reassure such staff, board members, consultants, and volunteers that they will be protected from reprisal or victimization as a consequence of reporting the alleged wrongdoing of any staff, board members, consultants, volunteers, or agent of GPA.

Statement of Policy

No staff, board members, consultants, volunteers, or agents of GPA shall take any harmful action with the intent to retaliate against any person, including interference with employment or livelihood, because that person: (a) reports to any appropriate senior management of GPA, any member of the Board of Directors of GPA, or to a federal, state or local agency what the person believes in good faith to be a violation of the law; or (b) participates in good faith in any resulting investigation or proceeding, or (c) exercises his or her rights under any state or federal law(s) or regulation(s) to pursue a claim or take legal action to protect such person's rights.

Safeguards

*Harassment or Victimization* – GPA will not tolerate the harassment or victimization of any staff, board members, consultants, or volunteers who raise concerns under this policy.
**Confidentiality** – GPA will make every effort to treat a complainant’s identity with an appropriate regard for confidentiality, with the understanding that the details of complaints may need to be shared with others in order to investigate such complaints properly.

**Anonymous Allegations** – Because a thorough investigation often depends on an ability to gather additional information, GPA encourages complainants to put their names to allegations of wrongdoing. GPA will explore anonymous allegations to the extent possible, but will weigh the prudence of continuing such investigations against the likelihood of confirming the alleged facts or circumstances from attributable sources.

**Bad Faith Allegations** – Allegations made in bad faith may result in disciplinary action.

**Procedure**

**Process for Raising a Concern:**

**Reporting** – GPA intends this policy to be used for serious and sensitive issues. Such concerns, including those relating to financial reporting or unethical or illegal conduct may be reported directly to: Mike Chamberlain, Chief Executive Officer (CEO). In the event that an individual’s concern rises to the level that he/she reasonably believes that notice to the CEO will be disregarded or otherwise not fairly considered, the individual may then report violations or suspected violations either to the President of the GPA Board of Directors or the Chair of the Finance Committee.

**Timing** – The earlier a concern is expressed, the easier it is to take action. GPA recommends timely if not immediate reporting of a concern.

**Evidence** – Although a complainant is not expected to prove the truth of an allegation, he or she should be able to demonstrate that he or she has made a report in good faith.

**How the Report of Concern Will Be Handled:**

**Initial Inquiries** – The official(s) or other person(s) to whom the report of concern was made (the CEO, President of the GPA Board of Directors and/or the Chair of the Finance Committee) (the “Official”) will make initial inquiries in consultation with legal counsel, if necessary, to determine whether or not further investigation is necessary or appropriate.
**Further Information** – The Official may seek further information from any staff, board members, consultants, volunteers, or agent of GPA, and shall take all reasonable precautions to protect the identity of the complainant to the extent possible while doing so.

**Reporting** – The Board of Directors shall receive information on each complaint. The Board of Directors will determine an appropriate response to a report of concern in consultation with the CEO and, if necessary, legal counsel. Staff, including the CEO, board members, consultants, volunteers, and agents of GPA who may be implicated in such reports shall not participate in any deliberation of the Board of Directors related to the complaint, except to present information directly to the Board on his or her own behalf.

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For additional information, please contact the GPA Chief Executive Officer, by email at [ceo@grantprofessionals.org](mailto:ceo@grantprofessionals.org) or by telephone at 913-788-3000. GPA reserves the right to modify or amend this policy at any time.