



## **Whistleblower Policy**

*Adopted: January 6, 2019*

### **1. ENCOURAGEMENT OF REPORTING**

The Society encourages the reporting of suspected illegal practices or serious violations of the Society's adopted policies, including illegal or financially improper conduct by the Society itself, by its leadership, or by others on its behalf. Appropriate subjects to raise under this policy include financial improprieties, accounting or audit matters, and ethical violations.

### **2. PROTECTION FROM RETALIATION**

The Society prohibits retaliation for the making of good faith reports under this policy or for participating in a review or investigation under this policy. This protection extends to those whose allegations are made in good faith but prove to be mistaken.

### **3. FORMAT AND CONTENT**

A report under this policy must be in writing and must sufficiently describe the suspected conduct that is the basis for the report. Reports should identify the person who prepared and is submitting the report, though anonymous reports may be considered if sufficiently detailed.

### **4. SUBMISSION**

A report must be submitted to the CEO or President. If both of those persons are implicated in the report, it may be directed to the President-Elect or the Secretary-Treasurer.

### **5. INVESTIGATION AND RESOLUTION**

The proper recipient of a report under this policy will notify the full Executive Committee (excluding any Executive Committee member implicated in the report), and these persons will conduct or oversee an investigation of the allegations contained in the report, consulting with legal, financial, and other advisors as they deem useful. Upon completion of the investigation, the Executive Committee will take appropriate action to effect the termination and correction of illegal, improper, or unethical practices determined to have occurred, if any, and effect disciplinary action against persons, if any, found to have engaged in such practices. The Executive Committee will inform the Board of Directors upon the initiation of any investigation and of the resolution, as well as provide interim reports as the Executive Committee deems appropriate.