



Whistleblower Policy

Approved January 16, 2013

The scope of this policy includes all officers, directors, employees, including temporary employees, consultants, volunteers, fellows, vendors, and other agents (“Whistleblower”).

Reporting Concerns

All Whistleblowers should submit Concerns in writing directly to the chair of the audit committee. Contact information for the audit committee chair may be obtained from the finance director.

Handling of Reported Violations

The audit committee shall address all reported Concerns. The audit committee chair shall immediately notify the audit committee and the executive director of any such report. The audit committee chair 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 audit 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 audit committee has the authority to retain outside legal counsel, accountants, private investigators, or any other resource deemed necessary to conduct a full and complete investigation of the allegations.

No Retaliation

This Whistleblower Policy is intended to encourage and enable all Whistleblowers to raise serious concerns within the organization for investigation and appropriate action. With this goal in mind, no Whistleblower who, in good faith, reports a concern shall be threatened, discriminated against or otherwise subject to retaliation or, in the case of an employee, adverse employment consequences as a result of such report. Moreover, an individual 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.

Acting in Good Faith

Whistleblowers 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 Codes. 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.

Confidentiality

Reports of Concerns, and investigations 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 discipline, up to and including termination of employment. Such conduct may also give rise to other actions, including civil lawsuits.