

# ALPHA PHI FOUNDATION

## WHISTLEBLOWER POLICY

### Purpose

Alpha Phi Foundation (Foundation) requires Board members, staff members, committee members and volunteers to observe high standards of business and personal ethics in the conduct of their duties and responsibilities, and to comply with all applicable laws and regulatory requirements.

### Reporting Responsibility

Alpha Phi Foundation seeks to have an “Open Door Policy” and encourages Board members, staff members, committee members and volunteers to share their questions, concerns, suggestions, or complaints regarding the Foundation and its operations with someone who can address them properly. In most cases, a Board member, committee member or volunteer should present his or her concerns to the Chair of the Board. The Executive Director is generally in the best position to address a staff member’s area of concern. However, if a Board member is not comfortable speaking with the Board Chair or is not comfortable with the Board Chair’s response, or if a staff member is not comfortable speaking with the Executive Director or if the staff member is not satisfied with the Executive Director’s response, the Board member, staff member, committee member or volunteer is encouraged to speak with anyone on the Board whom the individual is comfortable in approaching, or to directly contact the Foundation’s outside legal counsel, whose contact information can be obtained from the Executive Director.

### No Retaliation

No Board member, staff member, committee member, or volunteer who in good faith reports a violation of a law or regulation requirement shall suffer harassment, retaliation, or adverse employment consequence. A staff member who retaliates against someone who has reported a violation in good faith is subject to discipline up to and including termination of employment. This Whistleblower Policy is intended to encourage and enable persons to raise serious concerns within Alpha Phi Foundation prior to seeking resolution outside the Foundation.

### Compliance Officer

Alpha Phi Foundation’s Executive Director, working with the Chair of the Board, will act as Compliance Officer. The Compliance Officer is responsible for investigating and resolving all staff member complaints and allegations concerning violations of the Principles and/or Code. The Board Chair or her designee will take on the Compliance Officer role if the complaint involves the

Executive Director. If the complaint involves both the Executive Director and Board Chair, the Secretary or outside legal counsel will carry out the functions of the Compliance Officer.

### **Accounting and Auditing Matters**

The Finance and Audit Committee of the Board of Directors shall address all reported concerns or complaints regarding corporate accounting practices, internal controls or auditing. The Compliance Officer shall immediately notify the Finance and Audit Committee Chair of any such complaint and work with the Committee until the matter is resolved.

### **Requirement of Good Faith**

Anyone filing a complaint concerning a violation or suspected violation of the law or regulation requirements must be acting in good faith and have reasonable grounds for believing the information disclosed indicates a violation. Any allegations that prove not to be substantiated and which prove to have been made maliciously or knowingly to be false will be viewed as a serious disciplinary offense.

### **Confidentiality**

Violations or suspected violations may be submitted on a confidential basis by the complainant or may be submitted anonymously. Reports of violations or suspected violations will be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation, and/or proper notification of an investigation to the entire Board.

### **Handling of Reported Violations**

The Compliance Officer, or the person responsible for carrying out the Compliance Officer's role with respect to a reported or suspected violation, will acknowledge receipt of the reported violation or suspected violation by writing a letter (or e-mail) to the complainant within five business days. All reports will be promptly investigated and appropriate corrective action will be taken if warranted by the investigation, which may include notifying complainant of said actions taken.

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