

## **SAMPLE 1**

# **Whistleblower Policy**

## **1.0 Purpose**

This Policy Letter has been issued to establish the procedures for submitting complaints or concerns regarding: financial statement or other disclosures; Accounting; internal accounting controls or disclosure controls; auditing matters; or violations of the Ethics and Standards of Conduct Policy. This Whistleblower Policy is intended to cover serious concerns that could have an impact on <Your Organization> , such as actions that: (1) may lead to incorrect financial reporting; (2) are unlawful; (3) are not in accordance with company policy - including the Ethics and Standards of Conduct Policy; or (4) otherwise amount to serious improper conduct.

## **1.1 Previously Issued Policy Letters**

This Policy Letter does not supplement, rescind nor supersede any previously issued Policy Letter(s).

## **1.2 Authority & Compliance**

This policy/guidance applies to all employees of <Your Organization> . Any deviation(s) to the guidance contained herein shall be approved by the CFO.

## **1.3 Policy/Guidance**

Section 301 of the Sarbanes-Oxley Act suggests (does not currently require for not-for-profit organizations) that the Audit Committee of the Board of Trustees of <Your Organization>, establish procedures for (1) the receipt, retention, and treatment of complaints received by <Your Organization> regarding accounting, internal accounting controls, or auditing matters; and (2) the submission by employees of the Corporation and others, on a confidential and anonymous basis, of concerns regarding questionable accounting and auditing matters.

Since the Corporation is committed to the highest possible standards of ethical, moral, and legal business conduct, as well as open communication without reprisals or victimization, in accordance with Section 301, the Audit Committee has adopted the following procedures:

1. The Corporation shall immediately forward to the Audit Committee any complaints that it has received regarding financial statement disclosures, accounting, internal accounting or disclosure controls or auditing matters, disclosure violations, or violations of our Ethics and Standards of Conduct Policy.
2. Any employee of the Corporation may contact our toll-free, completely anonymous "Employee Whistleblower Hotline," which is administered through TeleSentry - a third party. For the hotline, use the contact information provided below, on a confidential, anonymous basis if the employee so desires, any good faith concerns regarding financial statement or other disclosure, accounting, internal accounting or disclosure controls, auditing matters, or violations of the Corporation's Ethics and Standards of Conduct Policy.
3. The Audit Committee may enlist committee members, employees of the Corporation and/or outside legal, accounting or other advisors, as appropriate, to conduct any investigation of complaints regarding financial statement disclosures, disclosure concerns or violations, accounting, internal accounting controls, auditing matters or violations of the Corporation's Ethics and Standards of Conduct Policy.
4. The Corporation does not permit retaliation of any kind against employees for complaints submitted hereunder. Additionally, no employee shall be adversely affected because the employee refuses to carry out a directive which he or she believes constitutes fraud, or any other violation of state or federal law or the Corporation's Ethics and Standards of Conduct Policy.
5. The Audit Committee shall retain, as a part of the records of the Audit Committee, any such complaints or concerns for a period of no less than seven (7) years.

## **1.4. Contact Information Employee Whistleblower Hotline: xxx - xxx - xxxx**