

George Wright Society Whistleblower Policy

(approved by the Board of Directors, December 2009)

Purpose

This policy reflects a Code of Conduct that requires directors, officers, and employees of the George Wright Society to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. As employees and representatives of the George Wright Society, we must practice honesty and integrity in fulfilling our responsibilities and comply with all applicable laws and regulations. It also is our responsibility to report violations of this Code in accordance with this Policy. No director, officer, or employee who in good faith reports a violation of the Code shall suffer harassment, retaliation, or adverse employment consequence.

Policy

Code of Conduct. The directors, officers, and employees of this organization are expected to adhere to high standards of ethical conduct. Although it is impossible to describe all conduct that is addressed, this policy specifically requires the following:

1. Dedication to George Wright Society's mission, vision, and core values, and recognition that the chief function of George Wright Society at all times is to serve the best interests of our membership.
2. The responsible and prudent management of George Wright Society's funds and assets.
3. Honest and ethical conduct, including the ethical handling of actual or apparent conflicts of interest between personal and professional relationships.
4. Full, fair, accurate, and timely disclosure of relevant facts in all reports and documents dealing with matters of program service, governance, and business administration.
5. Compliance with all applicable governmental laws, rules, and regulations; with all George Wright Society official policies; with all agreements entered into between the George Wright Society and other organizations; and (for members of the Board of Directors) with all ethical requirements imposed by that person's employer.
6. Treatment of all persons with respect, equity, and fairness regardless of race, religion, gender, ability, age, sexual orientation, or national origin, as detailed in the non-discrimination clause of the George Wright Society By-Laws.
7. Respect and protection of confidential and/or privileged information to which we have access in the course of our duties.
8. Prompt internal reporting of code violations to an appropriate person or persons within the organization.
9. Personal accountability for adherence to this Code of Conduct.

Reporting Responsibility

It is the responsibility of all directors, officers, and employees to comply with the Code and to report violations or suspected violations in accordance with this Whistleblower

Policy. Under this policy, it is a disciplinary issue for an employee to know of ethical misconduct and stay silent.

No Retaliation

No director, officer, or employee who in good faith reports a violation of the Code shall suffer harassment, retaliation, or adverse employment consequence. An employee 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 employees and others to raise serious concerns within George Wright Society prior to seeking resolution outside the organization.

Reporting Violations

The Code addresses George Wright Society's open door policy and suggests that employees share their questions, concerns, suggestions or complaints with someone who can address them properly. In most cases, an employee's supervisor is in the best position to address an area of concern. However, if you are not comfortable speaking with your supervisor or you are not satisfied with your supervisor's response, you are encouraged to speak with the Executive Director or anyone in management whom you are comfortable in approaching. Supervisors and managers are required to report suspected violations of the Code of Conduct to the George Wright Society Executive Director, who is the Compliance Officer for this Policy and who has specific and exclusive responsibility to investigate all reported violations. For suspected fraud, or when you are not satisfied or uncomfortable with following George Wright Society's open door policy, you should contact the Compliance Officer directly.

Compliance Officer

The George Wright Society's Compliance Officer is the Executive Director. The Compliance Officer is responsible for investigating and resolving all reported complaints and allegations concerning violations of the Code and, at his/her discretion, shall advise the Executive Committee of the Board of Directors. The Compliance Officer has direct access to the Executive Committee and is required to report to the Executive Committee at least annually whenever there has been compliance activity during the previous calendar year.

Accounting and Auditing Matters

In the event that a reported concern or complaint involves corporate accounting practices, internal controls of auditing, the Compliance Officer shall immediately notify the Finance Committee of the Board of Directors of the complaint and work with the Committee until the matter is resolved. The Finance Committee of the Board of Directors shall address all reported concerns or complaints regarding corporate accounting practices, internal controls or auditing.

Acting in Good Faith

Anyone filing a complaint concerning a violation or suspected violation of the Code must be acting in good faith and have reasonable grounds for believing the information disclosed indicates a violation of the Code. Any allegations that prove not to be substantiated and that 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.

Handling of Reported Violations

The Compliance Officer will notify the sender and acknowledge receipt of the reported violation or suspected violation within five business days. All reports will be promptly investigated and appropriate corrective action will be taken if warranted by the investigation.

Acknowledgment and Distribution of Policy

As it is the intent of George Wright Society to strive for high ethical conduct from all board and staff, the Board of Directors is particularly sensitive to individuals who hold management and governance positions of trust and confidence in fulfilling the mission and goals of the George Wright Society. These sensitive positions include all officers, members of the Board of Directors, the Executive Director, and key Senior Staff members designated by the Executive Director. Therefore, each of the above staff will receive a copy of this Policy, and any subsequent updates, and will be requested to acknowledge and sign upon the beginning of his/her service with or employment by the George Wright Society. This acknowledgment will be kept on file in the personnel files of each staff member and in the Board files for each Board members.

Statement of Compliance, George Wright Society Whistleblower Policy

I, the undersigned, as a:

- Officer of the George Wright Society
- Member of the George Wright Society Board of Directors (other than an officer)
- Employee of the George Wright Society
- Member of a George Wright Society committee with Board-delegated powers

(check one)

do hereby affirm that I:

- Have received a copy of the George Wright Society Whistleblower Policy;
- Have read the George Wright Society Whistleblower Policy, and understand it;
- Agree to fully comply with the Whistleblower Policy.

Name (printed)

Name (signed)

Date signed