



SIG TAU

FOUNDATION

Policy Manual

Sigma Tau Gamma Foundation, Inc.
Board of Trustees

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Sigma Tau Gamma Foundation, Inc.
Board of Trustees Policy

Title: WHISTLEBLOWER POLICY
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The Foundation requires Trustees, Officers, employees, and volunteers to observe high standards of business and personal ethics, and to comply with all applicable laws and regulations in the conduct of their duties and responsibilities. This Whistleblower Policy is intended to discourage illegal activity and business conduct that damages the Foundation's reputation, ability to fulfill its purpose, and relations with its donors and the community at large, and encourage and enable employees and others to raise serious concerns within the organization prior to seeking resolution outside the organization.

1. Trustees, employees and volunteers shall promptly report any suspected or actual occurrence(s) of illegal, dishonest, unethical or improper events or activities (behaviors or practices) to the Chief Executive Officer.
2. The CEO, Vice Chair, and Vice Chair of Stewardship are the Whistleblower Compliance Officers of the Foundation.
3. If the whistleblower is uncomfortable or otherwise reluctant to report the matter to the CEO, or if they believe that the CEO is involved or implicated in the matter, or feel that the CEO has not properly addressed the matter, then that person can report the matter to another Whistleblower Compliance Officer.
4. The whistleblower can report the matter with his or her identity revealed or anonymously. A whistleblower should understand that making a report anonymously could hinder and limit an investigation of the complaint.
5. The whistleblower must exercise sound judgment to avoid baseless allegations and act in good faith. A person will be deemed to be acting in good faith where they

report concerns they have a reason to believe are true, and not making unfounded allegations that are proven to have been made recklessly, maliciously, or with the foreknowledge that the allegations were false.

6. A whistleblower who makes a report that was provided in good faith shall receive no retaliation, retribution, harassment, abuse, threats or adverse employment consequences. The right of a whistleblower for protection against retaliation does not include immunity for any personal wrongdoing that is alleged and investigated.
7. A whistleblower who makes a report that was not done in good faith will be subject to disciplinary action up to and including termination of his or her trusteeship, employment, or volunteer position, and will be subject to other legal action necessary to protect the reputation of the Foundation, its donors, Trustees, and staff.
8. Anyone who retaliates against a whistleblower who reported a matter in good faith will be subject to disciplinary action, including the termination of his or her trusteeship, office, employment, or volunteer position.
9. Crimes against persons or property, such as assault, rape, burglary, and other crimes of similar import should immediately be reported to appropriate law enforcement officials.
10. The Whistleblower Compliance Officer who receives a report must act promptly to investigate or resolve the matter. Investigations will be conducted as quickly as possible, taking into account the nature and complexity of the disclosure and the matters and issues raised therein.
11. The whistleblower, if identified, shall receive a report from the Foundation official to whom the matter was reported, within ten (10) business days of the initial report, regarding the investigation, disposition or resolution of the matter.
12. If the investigation of a report that was made in good faith, and conducted by internal personnel, is not resolved to the whistleblower's satisfaction, then he or she has the right to report the matter to the appropriate agency.

13. The identity of the whistleblower, if known, shall remain confidential to the extent possible to those persons directly involved in applying this policy. However, the whistleblower's identity may have to be disclosed on a need to know basis to conduct a thorough investigation, where the matter requires investigation by law enforcement, to comply with law, and where the parties are subject to subpoena or oaths under penalty of perjury.
14. The Whistleblower Compliance Officers will maintain a record of complaints, and they will report annually regarding such matters to the Trustees.