

SAMPLE WHISTLEBLOWER POLICY

[Name of Organization]

Whistleblower Policy

Introduction

[Name] (the "Organization") is committed to the highest possible legal, ethical and moral standards of conduct and will not tolerate illegal or dishonest behavior. In this spirit, the Organization encourages its employees, officers and directors to identify any instances in which these standards may be compromised.

Scope

This Whistleblower Policy ('Policy') has been established to provide a means for employees, officers and directors to raise good faith concerns about behavior that appears to be illegal, dishonest or unethical. A Whistleblower is the employee, officer or director reporting such activity.

All employees, directors and officers are covered under the Policy. It is the responsibility of all directors, officers and employees to comply with the Policy and report any violations or suspected violations of the principles set forth herein.

Examples of serious misconduct covered by this Policy include, but are not limited to, violations of federal, state, or local laws; fraudulent financial reporting; destroying, altering, concealing, or falsifying a document, or attempting to do so, with the intent to impair the document's availability for use in an official proceeding; fraudulently influencing or misleading any independent public accountant engaged in the performance of an audit of the Organization's financial statements; or planning, facilitating, or concealing any of the above.

This is not meant to be an exhaustive list but rather a guide to the types of improper behavior covered by this Policy.

Procedure for Reporting Violations

Any person may report allegations of suspected improper activities. The individuals involved in such activities may be staff, officers, directors, auditors, vendors or other third parties.

The Organization has two Compliance Officers: the [President] and the [Treasurer]. A Whistleblower should direct all concerns, either in written or oral form, to either of the

Compliance Officers listed above, who will be responsible for investigating and resolving all reported complaints and allegations concerning violations of the Policy. The allegation submitted by the Whistleblower should include whatever documentation is available to support a reasonable basis for the claim and to assist the Compliance Officer in investigating the allegation.

If a Whistleblower is not comfortable communicating concerns to a Compliance Officer or is unsatisfied with the response, the Whistleblower is encouraged to speak with anyone in management with whom the employee is comfortable.

Allegations may be made anonymously. Anonymous allegations should be detailed to the greatest extent possible because follow up questions will not be possible.

Although the Whistleblower is not expected to prove the truth of the allegation(s), she or he must demonstrate reasonable grounds for concern. No investigation will be made of unspecified wrongdoing or broad allegations. The Whistleblower is not responsible for investigating the activity or for determining fault or corrective measures.

Unless the allegation is submitted anonymously or there are overriding legal or public interest concerns, the Whistleblower will receive acknowledgement of receipt of the allegation within five business days. All reports will be promptly investigated and appropriate, corrective action will be taken if warranted by the investigation.

Confidentiality

Any investigation will be conducted in a manner that conceals and protects the Whistleblower's identity to the greatest extent possible, consistent with the need to conduct a fair and adequate investigation.

No Retaliation

The Organization prohibits any form of harassment, retaliation, or other adverse employment consequence toward a Whistleblower in response to a good faith allegation under this Policy. Any person who retaliates against a Whistleblower or other individual who assists in the investigation is subject to appropriate disciplinary and corrective action, up to and including termination of employment in the case of an employee.

A Whistleblower's right to protection does not extend immunity for participating or being complicit in the matters that are the subject of the allegations or ensuing investigations.

Any employee, officer or director found to have knowingly made a false allegation with malicious intent or to have knowingly produced false information with respect to the complaint will be subject to disciplinary measures.