

**AAUW LOWER CONNECTICUT VALLEY EDUCATION AND
SCHOLARSHIP PROGRAM, INC.
WHISTLEBLOWER POLICY**

[ADOPTED JUNE 26, 2023]

General Statement

AAUW Lower Connecticut Valley Education and Scholarship Program, Inc. (“**Corporation**”) is committed to observing high standards of legal and ethical business conduct. The Corporation expects its directors, officers, employees and volunteers to exercise honesty and integrity in fulfilling the Corporation’s responsibilities and complying with all applicable laws and regulations. This policy is intended to encourage and enable good faith reporting of wrongful conduct and to protect individuals from retaliation who make such reports (“**Complainants**”).

Purpose

This policy creates a mechanism for a director, officer, employee, or volunteer to report wrongful conduct. Wrongful conduct is defined as a violation of applicable law or regulations or material violations of the Corporation’s operating policies (“**wrongful conduct**”).

Examples of wrongful conduct that this policy is intended to address include, but are not limited to:

- Falsification of the Corporation’s financial reports, tax returns or other financial documents;
- Non-compliance with the Corporation’s legal responsibilities;
- Misappropriation of funds or theft of property of the Corporation; or
- Material violations of conflict of interest, record retention, employee protection or other Corporation policies.

No Complainant who in good faith reports wrongful conduct will suffer retaliation, harassment or adverse employment consequences.

Reporting

A director or officer Complainant may report wrongful conduct directly to the Board Chair. If the Complainant believes that the concerns will not be fairly considered, or that the wrongful conduct report involves the Board Chair, the report of wrongful conduct can be made to another Officer of the Corporation.

The Corporation will make every effort to treat the Complainant’s identity with confidentiality, with the understanding that details of the allegations concerning the wrongful conduct may need to be shared with others in order to conduct a comprehensive investigation.

Anonymous reports, while accepted, impact the Corporation’s ability to conduct an investigation. Thus, Complainants are encouraged to disclose their identity to increase the credibility of the report and to enable the Corporation to investigate the matter thoroughly.

The Complainant will not be expected to prove the truth of his or her allegations of wrongful conduct, but he or she should be prepared to demonstrate that the allegations are made in good faith and to submit whatever evidence is available to support the allegations. Reports of unfounded allegations of wrongful

conduct that are demonstrated to have been made recklessly, maliciously or with the knowledge that the allegations were false may lead to disciplinary action up to and including termination or separation from the Corporation.

Response

A person or committee so designated by the Board will be responsible to supervise and direct a prompt investigation. The action taken will be dependent on the nature of the concern. A report of the conclusions of the investigation will be made to the entire Board of Directors, who will determine what disciplinary and corrective action, if any, shall be taken.

Retaliation Prohibited

No director, officer, employee or volunteer who reports wrongful conduct in good faith under this policy shall suffer threats, abuse, harassment, retaliation, discrimination or any other adverse employment or work consequence. A person within the Corporation who does retaliate against a director, officer, employee or volunteer is subject to discipline up to, and including, termination of employment or separation from the Corporation.

Any Complainant who believes that he or she has been retaliated against should report it to the Board Chair.

Notification of Policy

When an individual is first elected as a director or officer, or employed or accepted as a volunteer he or she must complete and deliver to the Corporation a certificate in the form specified by the Corporation, which, initially, will be as attached to this policy as **Annex A**.

Violations of Policy

Violations of this policy will be subject to such disciplinary and corrective action as the Board of Directors deems appropriate.

Periodic Reviews

The Board of Directors shall review this policy annually to ensure that it continues to satisfy the obligations of the Corporation. Any changes to the policy will be communicated timely to all employees and volunteers.