



Whistleblower Protection Policy

Part I

A whistleblower, as defined by this policy, is any employee or member of SALUTE Veterans National Honor Society [hereafter referred to as 'SALUTE'] who reports an activity that he/she considers to be illegal or dishonest, to the parties specified in this policy. Examples of illegal or dishonest activities include violations of federal, state or local laws, theft, accepting bribes, fraudulent financial reporting and fraudulent recordkeeping. The whistleblower must exercise sound judgment to avoid baseless allegations. If a whistleblower intentionally files a false report of wrongdoing he or she will be subject to disciplinary action up to and including termination. The whistleblower is not responsible for investigating the activity or for determining fault or corrective measures; the officers specified below are charged with these responsibilities.

The whistleblower is to report the alleged violation to the Executive Steering Committee Chair, who will conduct an investigation that may involve other officers and staff, as appropriate, and on a "need to know" basis. Should the alleged violation be related to the Executive Steering Committee Chair, the whistleblower shall report the activity to one or more of the other members of the Executive Steering Committee.

The confidentiality of the whistleblower will be maintained whenever possible. However, identity may have to be disclosed to conduct a thorough investigation. A whistleblower may report a complaint anonymously. An employee who, in good faith, reports a violation of this policy shall suffer no harassment, retaliation, or adverse employment consequence. Any employee who retaliates against a whistleblower who has reported a violation in good faith is subject to disciplinary action up to and including termination of employment. Any whistleblower who believes that he/she has been retaliated against must contact the Executive Steering Committee Chair immediately. The right of a whistleblower to protection against retaliation does not include immunity for any personal wrongdoing on the part of the whistleblower that is alleged and investigated, whether that wrongdoing is directly related to the aforementioned activity or otherwise.

The honor society coordinator will maintain a record of complaints, and they will be reported at least annually to the Executive Steering Committee.

Part II

SALUTE requires directors, managers, supervisors, and all staff associates to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. As staff

associates and representatives of SALUTE, we must practice honesty and integrity in the course of fulfilling our responsibilities and comply with all applicable laws and regulations. It is the responsibility of all directors, managers, supervisors, and all staff associates to comply with this Whistleblower policy by reporting violations or suspected violations.

SALUTE has an open-door policy and suggests that staff associates share their questions, concerns, suggestions, or complaints with someone who is able to properly assist them. Generally, the honor society coordinator should be the first point of contact. In the event you are uncomfortable speaking with the honor society coordinator, contact the Executive Director. Supervisors are required to report suspected or known violations to the Executive Director who has responsibility to facilitate an investigation of all reported violations. If resolution is not reached internally, or if the violation or suspected violation is of an egregious nature, the final resource for staff associates is to contact university legal resources.

Anyone filing a complaint concerning a violation of suspected violation should act in good faith and have reasonable grounds for believing the information disclosed indicates a violation. Any allegations that cannot be substantiated and which prove to have been made maliciously or are knowingly false will be viewed as a serious disciplinary offense.

The honor society coordinator or Executive Steering Committee Chair will notify the sender and acknowledge receipt of the reported violation or suspected violation within 10 business days. All reports will be promptly investigated on a consistent basis, and appropriate corrective action will be taken. No director, manager, supervisor, or other staff associate who in good faith reports a violation of this policy 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 disciplinary action up to and including termination of employment. The Whistleblower Policy is intended to encourage and enable staff associates to raise serious concerns within the organization prior to seeking resolution outside the organization.

Part III

A whistleblower, as defined by this policy, is an employee of SALUTE who reports an activity to the parties specified in this policy that would be considered to be illegal or dishonest. The whistleblower is not responsible for investigating the activity or for determining fault or corrective measures; appropriate management officials are charged with these responsibilities. Examples of illegal or dishonest activities include violations of federal, state or local laws, theft, accepting bribes, fraudulent financial reporting and fraudulent recordkeeping.

If an employee has knowledge of or a concern of illegal or dishonest activity, the employee is to contact his/her immediate supervisor. If the employee is concerned about the actions of his/her immediate supervisor, then the employee may go directly to the Executive Steering Committee Chair. The employee who reports the activity must exercise sound judgment to avoid baseless allegations. An employee who intentionally files a false report of wrongdoing will be subject to disciplinary action up to and including termination.

Whistleblower protections are provided in two important areas—confidentiality and protection against retaliation. The confidentiality of the whistleblower will be maintained whenever possible. However, identity may have to be disclosed to conduct a thorough investigation, to comply with the law and to provide accused individuals their legal rights of defense. SALUTE will not retaliate against a

whistleblower. This includes, but is not limited to, protection from retaliation in the form of an adverse employment action such as termination, compensation decreases, poor work assignments, and threats of physical harm. Any whistleblower who believes that he/she is being retaliated against must contact the Executive Steering Committee Chair immediately. The right of a whistleblower for protection against retaliation does not include immunity for any personal wrongdoing that is alleged and investigated.

Each reported incident will be investigated by an investigation team typically consisting of the following people and groups: the respective supervisors of the party or parties involved and possibly other management staff and employees or counselors.