



## **Whistleblower (Employee Protection) Policy**

*Updated July 2023*

This Whistleblower (Employee Protection) Policy is intended to encourage and enable employees to raise serious concerns internally so that the Virginia War Memorial Foundation (VWMF) can address and correct inappropriate conduct and actions.

### **No Retaliation**

It is contrary to the values of the VWMF for anyone to retaliate against any board member, officer, employee or volunteer who in good faith reports an ethics violation, or a suspected violation of law, such as a complaint of discrimination, or suspected fraud, or suspected violation of any regulation governing the operations of the VWMF. 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.

### **Reporting Procedure**

The VWMF has an open-door policy and suggests that employees share their questions, concerns, suggestions or complaints first with the VWMF President. If the VWMF President is the subject of the concern, then the employee should share the concern with a board member.

The VWMF President or the informed board member is required to report complaints or concerns about suspected ethical and legal violations in writing to the Chair of the Board of Directors, who has the responsibility to investigate all reported complaints and to ensure that all complaints about unethical or illegal conduct are investigated and resolved.

### **Acting in Good Faith**

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

All reports will be promptly investigated by the Compliance Officer. The duties of the VWMF compliance officer will be shared by the VWMF President and by the Board Chair. The compliance officer is required to report to the Finance, Audit, and Endowment (FAE) Committee of the Board any concerns or complaints regarding corporate accounting practices, internal controls or auditing. The Compliance Officer is required to report in writing the findings of any investigation to the complainant.