



Whistleblower Policy

Updated August 2026

The Virginia War Memorial Foundation (VWMF) encourages board members, officers, employees, volunteers, and other individuals to raise good-faith concerns about suspected unethical or unlawful conduct so that VWMF can appropriately review and address those concerns.

No Retaliation

It is contrary to the values of the VWMF for anyone to retaliate against any individual 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. Any employee who retaliates against a person who has reported a violation in good faith is subject to disciplinary action up to and including termination of employment.

Acting in Good Faith

Anyone filing a 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.

Reporting Procedure

The VWMF has an open-door policy and encourages individuals to share their questions, concerns, suggestions or complaints.

An individual should ordinarily report a concern first to the VWMF President. If the VWMF President is the subject of the concern, then the individual should share the concern with the Board Chair or another VWMF board member.

The President or any VWMF board member who receives a whistleblower complaint or concern must promptly provide the report to the Board Chair, unless the Board Chair is the subject of the concern. If the Board Chair is the subject of the concern, the report should be provided to the Chair of the Finance, Audit, and Endowment (FAE) Committee.

Reports concerning suspected ethical or legal violations should be documented in writing so that they can be appropriately reviewed and investigated.

Handling of Reported Violations

For purposes of this policy, the VWMF Compliance Officers are the:

- VWMF President;
- Chair of the Board of Directors; and
- Chair of the Finance, Audit, and Endowment Committee.

The Compliance Officers are responsible for ensuring that reports made under this policy are promptly and appropriately reviewed and investigated.

A Compliance Officer who is the subject of a complaint, is implicated in the reported conduct, or otherwise has a conflict of interest must not participate in reviewing, investigating, or making decisions regarding that complaint. The remaining disinterested Compliance Officer(s) will determine the appropriate process for reviewing and investigating the matter.

Any concern or complaint involving corporate accounting practices, internal controls, or auditing must be reported to the Finance, Audit, and Endowment Committee. The FAE Committee will provide appropriate Board-level oversight of the handling of such matters.

The complainant will be informed, as appropriate, that the matter has been addressed, subject to confidentiality, personnel, and legal restrictions.

For Additional Information or Questions, Contact:

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