

## New York State Women, Incorporated Whistleblower Policy

### **General**

New York State Women, Incorporated (NYSWI) requires directors, officers, committee person and vendors to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. As volunteers and representatives of the NYSWI, we must practice honesty and integrity in fulfilling our responsibilities and comply with all applicable laws and regulations.

### **Reporting Responsibility**

It is the responsibility of all directors, officers, committees and vendors to report ethics violations or suspected violations in accordance with this Whistleblower Policy.

### **No Retaliation**

No director, officers, committee person or vendor who in good faith reports an ethics violation shall suffer harassment, retaliation or adverse consequence. Anyone who retaliates against someone who has reported a violation in good faith is subject to discipline and removal. This Whistleblower Policy is intended to encourage and enable volunteers and others to raise serious concerns with NYSWI prior to seeking resolution outside NYSWI.

### **Reporting Violations**

NYSWI has an open door policy and suggests that volunteers share their questions, concerns, suggestions or complaints with someone who can address them properly. In most cases the president is in the best position to address an area of concern. The president is required to report suspected ethics violation to NYSWI's compliance officer, who has specific and exclusive responsibility to investigate all reported violations. For suspected fraud or when you are not satisfied or uncomfortable with NYSWI's open door policy, individuals should contact NYSWI's compliance officer directly.

### **Compliance Officer**

NYSWI's compliance officer is responsible for investigating and resolving all reported complaints and allegations concerning violations and, at his/her discretion, shall advise the president and/or audit committee (auditor). The compliance officer has direct access to the auditor of the board of directors and is required to report to the auditor at least annually on compliance activity. NYSWI's compliance officer is the audit committee/finance committee chair.

### **Accounting and Auditing Matters**

The audit committee and/or finance committee chair of the board of directors shall address all reported concerns or complaints regarding corporate accounting practices, internal controls or auditing. The compliance officer shall immediately notify the audit committee/finance committee of any such complaint and work with the committee until the matter is resolved.

### **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 or may be submitted anonymously. Reports of violations or suspected violations will be kept confidential to the extent possible, consistent with the need to conduct as adequate investigation.

**Handling of Reported Violations**

The compliance officer will notify the sender and acknowledge receipt of the reported violation or suspected violation within five business days. All reports will be promptly investigated and appropriate corrective action will be taken if warranted by the investigation.

**Audit Committee Compliance Office/Finance Committee**

Name

Organization

Contact information

**NYSWI's President**

Policy Approved by the NYSWI's Board of Directors on \_\_\_\_\_.