

STEILACOOM HISTORICAL EDUCATION FOUNDATION
Whistleblower Policy
(As of July 2018)

Purpose

Steilacoom Historical Education Foundation (“Corporation”) is committed to lawful and ethical behavior in all of its activities and requires its directors, officers, employees, and volunteers to act in accordance with all applicable laws, regulations and policies and to observe high standards of business and personal ethics in the conduct of their duties and responsibilities.

The objectives of this policy are to establish standards and procedures to:

- prevent or detect and correct improper activities;
- encourage each Corporation director, officer, employee, and volunteer (“reporting Individual”) to report what he or she in good faith believes to be a material violation of law or policy or questionable accounting, auditing or financial practices by Corporation;
- ensure the receipt, documentation, retention of records, and resolution of reports received under this policy; and
- protect reporting Individuals from retaliatory action.

Reporting Responsibility

Each reporting Individual has an obligation to report what he or she believes in good faith is a material violation of law or policy or any questionable accounting, auditing or financial practices by Corporation or its officers, directors, employees, volunteers, contractors, agents or other representatives. The types of concerns that should be reported include, for purposes of illustration and without being limited to, the following:

- providing false or misleading information in financial documents, grant reports, tax returns or other external communications;
- providing false or misleading information to or withholding material information from Corporation’s auditors, accountants, lawyers, directors or other representatives involved in ensuring compliance with fiscal and legal responsibilities;
- embezzlement, private benefit, or misappropriation of funds;
- material violations of Corporation policies, including among others, any document retention, check-signing, personnel, investment, compensation, and travel reimbursement policies;
- discrimination based on race, gender, ethnicity, disability or another legally protected class; and
- facilitating or concealing any of the above or similar actions.

Reporting Complaints, Concerns or Questionable Practices

Contact Information. To report complaints or concerns pursuant to this policy, reporting Individuals should provide details in writing to the President of Corporation, at PO Box 88576, Steilacoom, Washington 98388. In the event the President is involved in the complaint or report at issue, the reporting Individual is not comfortable reporting to the President, or the President is otherwise unavailable, reporting Individuals should contact any other member of Corporation's Board of Directors. The names of the current directors may be found at shefonline.com. In the event the reporting Individual does not feel comfortable reporting complaints to any of the directors of Corporation, the reporting Individual should report complaints to the Regional Dollars for Scholars Office or Scholarship America.

Content of Reports. In order to facilitate a complete investigation, reporting Individuals should be prepared to provide as many details as possible, including a description of the questionable practice or behavior, the names of any persons involved, the names of possible witnesses, dates, times, places, and any other available details. Corporation encourages all reporting Individuals with complaints or concerns to come forward with information and prohibits retaliation against any individuals raising concerns. Nonetheless, if a reporting Individual feels more comfortable doing so, reports may be made confidentially and/or anonymously. Reports of concerns, and investigations pertaining to such reports, shall be kept confidential to the extent possible; however, consistent with the need to conduct an adequate investigation and Corporation's obligation to investigate and correct unethical or unlawful practices, Corporation cannot guarantee complete confidentiality or that the identity of the reporting Individual will remain confidential.

Requirement of Good Faith

A reporting Individual reporting a complaint must be acting in good faith and have reasonable grounds for believing the information disclosed indicates a violation of law or policy. A reporting Individual who makes a report that is not done in good faith is subject to discipline, including termination of his or her relationship with Corporation or other legal means to protect the reputation of Corporation and members of its Board and staff.

Investigation and Response

Corporation directors will investigate all reports filed in accordance with this policy with due care and promptness. Corporation directors will determine if the allegations are true, whether the issue is material, and what, if any, corrective action is necessary to ensure compliance with legal and ethical requirements.

No Retaliation

This policy is intended to encourage and enable reporting Individuals to raise concerns within the organization for investigation and appropriate action. Corporation will not retaliate or engage in any form of reprisal, including adverse employment action, against a reporting Individual for making a good faith report or participating in an investigation pursuant to this policy. A person who retaliates against someone who has reported a concern in good faith is subject to discipline up to and including dismissal. Reporting Individuals who believe they have been subjected to retaliation because they have made a

report or participated in an investigation should report such suspected retaliation in the same manner as described above for the reporting of questionable practices.

Questions

Questions about this policy should be directed to Steilacoom Historical Education Foundation, at PO Box 88576, Steilacoom, Washington 98388.

Amendments

Any amendments to this policy must be provided to Scholarship America within ten (10) days of being approved by the Corporation’s Board of Directors.

My signature below indicates my receipt and understanding of this policy. I also verify that I have been provided with an opportunity to ask questions about this policy.

Name (printed)

Title/Position

Signature

Date