

## ACMP Pacific Northwest Chapter (ACMP PNW)

### Whistleblower Protection and Non-Retaliation Policy<sup>1</sup>

#### I. General

The ACMP PNW's Code of Ethics requires directors, officers, employees, and volunteers to observe high standards of business and personal ethics in the conduct of their duties and responsibilities.

As employees and representatives of the ACMP PNW, we must practice honesty and integrity in fulfilling our responsibilities and comply with all applicable laws and regulations.

#### II. Reporting Responsibility

This Whistleblower Policy is intended to encourage and enable employees and others to raise serious concerns internally so that the ACMP PNW can address and correct inappropriate conduct and actions.

It is the responsibility of all board members, officers, employees, and volunteers to comply with and to report concerns about violations of the ACMP PNW's Code of Ethics, or suspected violations of law or regulations that govern the ACMP PNW's operations.

#### III. No Retaliation

It is contrary to the values of ACMP PNW 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 ACMP PNW.

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.

A director who retaliates against someone who has reported a violation in good faith is subject to immediate removal.

#### IV. Reporting Procedure

Directors, officers, employees, and volunteers should share their questions, concerns, suggestions, or complaints with someone who can address them properly.

In most cases, employees and volunteers should report to the ACMP PNW Vice President.

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<sup>1</sup> Based upon a Whistleblower policy Copyright February 2010, National Council of Nonprofits, <https://www.councilofnonprofits.org/>. The National Council of Nonprofits is the network of state and regional nonprofit associations serving over 25,000 members in 46 states and the District of Columbia. The National Council of Nonprofits links local organizations to a national audience through state associations and helps small and mid-sized nonprofits: manage and lead more effectively; collaborate and exchange solutions; save money through group buying opportunities; engage in critical policy issues affecting the sector; and achieve greater impact in their communities.

However, if an employee or volunteer is not comfortable speaking with the ACMP PNW Vice President or is not satisfied with the response, that employee or volunteer is encouraged to report to any Officer of the Board.

#### V. Compliance Officer

The ACMP PNW's Vice President acts as the Compliance Officer and is responsible for ensuring that all complaints about unethical or illegal conduct are investigated and resolved. The Compliance Officer will advise the President and/or the Board of Directors of all complaints and their resolution.

#### VI. Accounting and Auditing Matters

The ACMP PNW's Compliance Officer shall immediately notify the Finance Committee of any concerns or complaint regarding corporate accounting practices, internal controls, or auditing, and work with the committee until the matter is resolved.

#### VII. 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.

#### VIII. 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.

#### IX. Handling of Reported Violations

The ACMP PNW's Compliance Officer will notify the person who submitted a complaint and acknowledge receipt of the reported violation or suspected violation. All reports will be promptly investigated, and appropriate corrective action will be taken if warranted by the investigation.

Adopted by the Board of Directors on June 15, 2021