

AIA Fort Worth WHISTLEBLOWER POLICY

Purpose

AIA Fort Worth (AIAFW) is open and accountable to its members and employees. The AIAFW Executive Committee expects all AIA volunteers and employees to obey the law and act ethically. It also expects employees to report honestly to their supervisors. It requires that volunteers and employees contact the Executive Director or AIAFW officers, as appropriate, about any activity that they think might violate law, policy, or ethical standards.

This policy is intended to cover serious concerns that could affect the AIAFW. These include actions that:

- could lead to inaccurate financial reporting;
- are unlawful, such as fraud, theft, embezzlement, or other illegal activities;
- are inconsistent with policies or procedures;
- otherwise amount to serious misconduct, such as unethical business conduct, other inappropriate conduct, or concerns about employee health risks that are caused by or are otherwise under the control of AIAFW management. (Such health concerns might arise, for example, if AIAFW management were to permit asbestos-containing insulation to be removed without properly protecting employees);
- result in the destruction of documents in a manner inconsistent with the AIAFW's records retention policy; or
- result in the inappropriate or illegal use of AIAFW property (e.g., using AIAFW property for personal gain).

The policy is intended to encourage and enable you and others to raise serious concerns within the AIAFW before seeking action from outside sources.

Protecting Your Confidentiality

Every effort will be made to protect your confidentiality, and AIAFW will not tolerate harassment or retaliation of any sort against anybody submitting a report under this policy. While anonymous reports will be accepted, you are encouraged to identify yourself in order to strengthen the credibility of your report and to help the follow-up investigation. Malicious or knowing false reports, however, may result in disciplinary action, up to and including termination of your employment or service as a volunteer.

Reporting a Violation

The Immediate Past Chapter President (IPCP) is charged with receiving and handling the disposition of violations covered under this policy. [Explanation: In the absence of a chapter general counsel, the immediate past president would logically have some insight into the situation but yet have the least personal conflict of interest]

You should follow these guidelines when reporting a violation under this policy:

- Where possible, if you are an employee, volunteer or chapter member, you should report the violation initially to the Executive Director. In most cases, the Executive Director should be in the best position to address an area of concern.
- This policy requires the Executive Director to report suspected violations to the Immediate Past President.
- Except under extraordinary circumstances, the President and the Executive Director will be informed when a report is received. Other persons may also be notified on a need-to-know basis.

Reporting Violations Concerning Fraud or Financial Matters

If the violation you are reporting has to do with fraud or financial misconduct, you may follow the procedures shown above.

Investigation and Report

The following guidelines apply to investigations:

- The Immediate Past Chapter President has specific and exclusive responsibility to investigate all reported violations. If the IPCP finds it appropriate to recuse him/herself, he/she will retain impartial outside counsel or auditors to conduct the investigation.
- To the extent possible, your report will be acknowledged within 5 business days. You will also be informed about next steps and about when you may expect to hear more about the investigation of your reported allegations.
- The IPCP will conduct a prompt investigation, while doing everything possible to keep your identity and role confidential. (You should be aware, however, that legal requirements or other circumstances may make it impossible to fully protect confidentiality in some cases.) You will be notified within two (2) weeks if a broader investigation appears to be needed.
- You are not expected to prove the truth of your allegations. You should, however, be prepared to be interviewed (unless your report is anonymous) and to submit whatever evidence is available to support the allegations.
- The IPCP will submit a written report, which will include a summary of the allegations and his/ her recommendations, to members of the AIAFW Executive Committee as appropriate. You will be informed about the results of the report.
- Where appropriate, corrective action will be taken. The action taken will depend on how serious the pertinent violation is and may include such things as a warning, a letter of reprimand, suspension with or without pay, or termination of employment. In the case of a volunteer, corrective action may include such things as limitations on the volunteer's opportunity to serve on AIAFW committees.

Adopted by the AIAFW Executive Committee March 17, 2009