

*Midwest Regional Chapter
Society of Quality Assurance*



CHAPTER PROCEDURE

Title: MWSQA Whistleblower Policy

Date of Approval: 28 February 2011

PURPOSE/SCOPE

The purpose of the Midwest Society of Quality Assurance (MWSQA) Whistleblower Policy is to establish policies and procedures for:

- The submission of concerns regarding questionable accounting matters and unlawful activities, policies or practices by directors, officers and other stakeholders of the organization, on a confidential and anonymous basis;
- The receipt, retention and treatment of complaints received by the organization regarding accounting, internal controls, or auditing matters;
- The protection of directors, volunteers and contractors reporting concerns from retaliatory actions.

INTRODUCTION

Each director, volunteer and contractor of MWSQA has an obligation to report in accordance with this Whistleblower Policy (a) questionable or improper accounting matters, and (b) unlawful activities, policies or practices of the Organization (hereinafter collectively referred to as Concerns).

1. All reported Concerns will be forwarded to the Board of Directors (BoD) in accordance with the procedures set forth herein. The BoD shall be responsible for investigating and making appropriate recommendations, and taking appropriate corrective action with respect to all reported Concerns.
2. No director, volunteer or employee who, in good faith, reports a Concern shall be subject to retaliation.
3. A volunteer or contractor who retaliates against someone who has reported a Concern in good faith is subject to discipline up to and including dismissal from the volunteer position or termination of contract employment.
4. Anyone reporting a Concern must act in good faith and have reasonable grounds for believing the information disclosed indicates an improper accounting practice or a violation of a law, rule or regulation mandated pursuant to law or is in violation of a clear mandate of public policy concerning the health, safety, welfare and protection of the Organization.

Procedures and Position Descriptions

5. The act of making allegations that prove to be unsubstantiated and that prove to have been made maliciously, recklessly, or with the foreknowledge that the allegations are false, will be viewed as a serious disciplinary offense and may result in discipline, up to and including dismissal from the volunteer position or termination of the employment contract. Such conduct may also give rise to other actions, including civil lawsuits.

PROCEDURE

RESPONSIBILITY

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| 1. Submit Concerns in writing directly to the Board of Directors (BOD). Contact information for the BOD is available on MWSQA's website. If the Concern is with respect to the Chair of the BOD, then the Concern may be reported to any other member of the BOD. | Directors, other volunteers and contractors |
| 2. Notification of the concern shall immediately be provided to the BOD and MWSQA President. | All BoD members |
| 3. All reported concerns will be addressed. | BoD |
| 4. The sender shall be notified and receipt of the Concern acknowledged within five (5) business days, if possible. It will not be possible to acknowledge receipt of anonymously submitted Concerns. | BoD Representative |
| 5. All reports shall be promptly investigated and appropriate corrective action shall be taken following appropriate approval, if warranted by the investigation. In addition, action taken must include a conclusion and/or follow-up with the complainant for complete closure of the Concern. | BoD |
| 6. If necessary, upon appropriate authorization, outside legal counsel, accountant, private investigator or any other resource deemed necessary may be consulted to conduct a full and complete investigation of the allegations. | BoD |
| 7. Reports of Concerns, and investigations pertaining thereto, shall be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation. Disclosure of reports of Concerns to individuals not involved in the investigation will be viewed as a serious disciplinary offense and may result in discipline, dismissal from the volunteer position or termination of the employment contract, as appropriate. Such conduct may also give rise to other actions, including civil lawsuits. | BoD |

Owner: President