

# Whistleblower Policy

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for the *International Sand Collectors Society, Inc.*

## Article I: Purpose

The **International Sand Collectors Society, Inc.** (the “Society”) requires its members, including its Board and committee members, to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. As members and representatives of the organization, it is important to comply with all applicable laws and regulatory requirements.

## Article II: Reporting Responsibility

The Society has an “Open Door” policy and encourages everyone to share their concerns, and complaints regarding the Society and its operations with the appropriate Society authority. A committee member should present his or her concerns to the Committee Chair. A member or board member should present his or her concerns to the President. However, if a committee member is not comfortable speaking with the Committee Chair or is not comfortable with the Committee Chair’s response, or if a member or board member is not comfortable speaking with the President or is not satisfied with the President’s response, the member or board member is encouraged to speak with anyone on the Board whom the individual is comfortable in approaching.

## Article III: Requirement of Good Faith

Anyone filing a complaint concerning a violation or suspected violation of the Society’s policies, or any laws or regulation requirements, 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.

## Article IV: No Retaliation

No individual who in good faith reports a violation shall suffer harassment, retaliation, or any adverse employment consequence. Any individual who retaliates against someone who has reported a violation in good faith is subject to discipline up to and including termination of membership in the Society. This Whistleblower Policy is intended to encourage and enable all individuals to report violations and concerns within the Society to the Society prior to seeking resolution outside the Society.

## Article V: Compliance Officer

The Society’s President, working with Committee Chairs, will act as the Society’s Compliance Officer. The Compliance Officer is responsible for investigating and resolving complaints and allegations concerning violations of all applicable laws and regulations, including the Society’s bylaws and/or Code of Conduct. If the complaint involves both the President and Committee Chair, the Vice President will carry out the functions of the Compliance Officer.

## **Article VI: Accounting and Auditing Matters**

The Treasurer or Finance Committee of the Board of Directors shall address all reported concerns or complaints regarding the Society's accounting practices, internal controls, or auditing. The Compliance Officer shall immediately notify the Treasurer or Finance Committee of any such complaint and work with the Treasurer or Committee until the matter is resolved.

## **Article VII: Confidentiality**

Violations or suspected violations may be submitted anonymously or 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.

## **Article VIII: Handling of Reported Violations**

The Compliance Officer, or the person responsible for carrying out the Compliance Officer's role with respect to a reported or suspected violation, will acknowledge receipt of the reported violation or suspected violation by writing a letter (or e-mail) to the complainant within five business days. All reports will be promptly investigated, and appropriate corrective action will be taken if warranted by the investigation.