

Whistle-Blower Policy

**Approved by the Board June 24, 2020
Updated July, 2020**

Purpose

The Hunter College High School Alumnae/i Association (“HCHSAA”) requires the members of its Board of Directors (the “Board”), officers, employees, consultants and volunteers to act in accordance with all applicable laws and regulations, and with HCHSAA policies at all times, and to assist in ensuring that HCHSAA conducts its business and affairs accordingly.

Any director, officer, employee, consultant or volunteer who has engaged in, or who reasonably suspects any other director, officer, employee, consultant, or volunteer of engaging in, any violation of the law, regulations, ethical rules or any HCHSAA policy (each a “Violation”) must report any such Violation as soon as possible. Violations may include, but are not limited to, financial wrongdoing (including circumvention of internal controls or violation of the HCHSAA accounting policies), fraud, harassment, or any other illegal or unethical conduct or violation of HCHSAA policy.

Reporting a Violation

HCHSAA’s directors, officers, employees, consultants and volunteers should raise concerns with and report Violations to the President or any officer or director whom such person is comfortable addressing. Reports may be made anonymously, but the obligation to report a violation of a law, regulation or HCHSAA policy is not satisfied by the individual reporting his or her own violation anonymously. Any person receiving such a report must refer it internally as soon as possible.

This Whistleblower Policy will not apply to allegations made with reckless disregard for their accuracy. People making such allegations may be subject to disciplinary action by HCHSAA and legal claims by individuals falsely accused of unethical or unlawful conduct.

No Retaliation

There will be no adverse employment action or other retaliation against any director, officer, employee, consultant or volunteer who reports a suspected Violation or assists in an investigation, except in those instances where HCHSAA determines that a false report was made with reckless disregard for the truth.

Intimidation, harassment, coercion, threats, discrimination or other retaliation against any director, officer, employee, consultant or volunteer who reports suspected wrongdoing is prohibited and will be subject to appropriate disciplinary action, which may include termination.

Chair of the Governance Committee

The Chair of the Governance Committee is responsible for ensuring that all complaints about unethical or illegal conduct are reported to the HCHSAA Board of Directors (or any other body responsible for the management of HCHSAA) (the “Board”). The Chair of the Governance Committee will advise the Board or any authorized committee thereof of all complaints and their resolution and will report at least annually to the Treasurer on compliance activity relating to accounting or alleged financial improprieties.

Board Action

All reports will be investigated and resolved as directed by the Board and handled in a timely and sensitive manner.

The person who is the subject of a complaint hereunder may not be present at or participate in Board or committee deliberations or vote on any matter relating to such complaint, provided that nothing herein will prohibit the Board or committee from requesting that the person who is the subject of a complaint present information as background or answer questions at a Board or committee meeting prior to the commencement of deliberations or voting related thereto.

Confidentiality

The Board (or any authorized committee thereof) will maintain the confidentiality of the identity of any person reporting a Violation and the subject of any such report throughout the investigation to the extent reasonable and practicable under the circumstances, and consistent with appropriate investigative and corrective action.

Distribution

A copy of this policy will be distributed to all directors, officers and employees and to all volunteers who provide substantial services to HCHSAA.