

Connecticut Society Sons of the American Revolution

CTSSAR

Whistleblower Policy

General

The CTSSAR Code of Organization Conduct (hereinafter referred to as the Code) requires officers, executive committee members, and committee chairmen to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. The same high standards are expected of all members and volunteers. Officers, executive committee members, committee chairmen, and committee members are representatives of the CTSSAR and must practice honesty and integrity in fulfilling their responsibilities and comply with all applicable laws and regulations.

The objectives of the CTSSAR Whistleblower Policy are to establish policies and procedures for:

- The submission of concerns regarding questionable accounting or audit matters by officers, committee chairmen, committee members, and other stakeholders of the CTSSAR, on a confidential and anonymous basis.
- The receipt, retention, and treatment of complaints received by the CTSSAR regarding accounting, internal controls, or auditing matters.
- The protection of officers, committee chairmen, committee members, and other stakeholders reporting concerns from retaliatory actions.

Reporting Responsibility

Each officer, committee chairman, committee member, and other stakeholder of the CTSSAR has an obligation to report in accordance with this Whistleblower Policy (a) questionable or improper accounting or auditing matters, and (b) violations and suspected violations of the CTSSAR Organization's Code (hereinafter collectively referred to as Concerns).

Authority of CTSSAR Compliance Officer

The CTSSAR Compliance Officer is appointed by the State President and his term will end simultaneously with the term of the State President. All reported Concerns will be forwarded to the CTSSAR Compliance Officer in accordance with the procedures set forth herein. The CTSSAR Compliance Officer shall be responsible for investigating, and making appropriate recommendations to the CTSSAR Audit Committee and the CTSSAR Executive Committee. If the CTSSAR Compliance Officer is the subject of the Concern, the CTSSAR Audit Committee Chairman will receive the reported Concerns, and be responsible for investigating, and making appropriate recommendations to the Audit Committee and the CTSSAR Executive Committee.

No Retaliation

This Whistleblower Policy is intended to encourage and enable officers, committee chairmen, committee members, and other stakeholders to raise Concerns within the CTSSAR for investigation and appropriate action. With this goal in mind, no officer, committee chairman, committee member, or other stakeholder who, in good faith, reports a Concern shall be subject to retaliation. Moreover, a CTSSAR member who retaliates against someone who has reported a Concern in good faith is subject to discipline consistent with the CTSSAR Constitution and Bylaws.

Reporting Concerns

CTSSAR Members and Other Stakeholders

CTSSAR members and other stakeholders should submit Concerns in writing directly to the CTSSAR Compliance Officer, or in the case of a Concern about the Compliance Officer, to the CTSSAR Audit Committee Chairman. Contact information for the CTSSAR Compliance Officer and Audit Committee Chairman may be obtained from the CTSSAR website.

Acting in Good Faith

Anyone reporting a Concern must act in good faith and have reasonable grounds for believing the information disclosed indicates an improper accounting or auditing practice, or a violation of the CTSSAR Organization Code. 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 consistent with the CTSSAR Constitution and Bylaws.

Handling of Reported Violations

The CTSSAR Compliance Officer shall address all reported Concerns. The CTSSAR Compliance Officer shall immediately notify the CTSSAR Audit Committee Chairman and State President of any such reported Concern. The CTSSAR Compliance Officer will notify the sender and acknowledge receipt of the Concern within five business days, if possible. It will not be possible to acknowledge receipt of anonymously submitted Concerns.

All reports will be promptly investigated by the CTSSAR Compliance Officer, and appropriate corrective action will be recommended to the CTSSAR Audit Committee Chair and the Executive Committee, 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.

The CTSSAR Compliance Officer, with the concurrence of the Executive Committee, has the authority to obtain resources deemed necessary to conduct a full and complete investigation of the allegations.

Confidentiality

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 consistent with the CTSSAR Constitution and Bylaws.

Revised 02/24/2013 (138899)