REPORTING OF UNETHICAL OR ILLEGAL CONDUCT AND NON-RETALIATION POLICY

[ORGANIZATION NAME] is committed to lawful and ethical behavior in all of its activities. It requires its directors, officers and employees to conduct themselves in a manner that complies with all applicable laws and regulations. If at any time you have a concern regarding the propriety or legality of any action contemplated to be taken or that has been taken by any director, officer, employee, grantor, grantee, collaborator, contractor, or vendor as the action relates to [ORGANIZATION NAME]’s activities, or you believe if an action needs to be taken in order for [ORGANIZATION NAME] to be in compliance with law or appropriate ethical standards, you can address the issue directly by talking with the Executive Director. Alternatively, if you are not comfortable speaking to the Executive Director or do not feel your issue has been properly addressed, you may contact the [President of the Board of Directors]. The audit committee of the board of directors shall address all reported concerns or complaints regarding corporate accounting practices, internal controls or auditing. The Executive Director shall immediately notify the audit committee of any such complaint and work with the committee until the matter is resolved.

Acting in Good Faith

Anyone filing a complaint concerning a violation or suspected violation 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.

Confidentiality

Under this policy (sometimes referred to as a “whistleblower policy”), those who report illegal or improper activity will be protected. Violations or suspected violations may be submitted on a confidential basis by the complainant or may be submitted anonymously. [ORGANIZATION NAME] will make efforts to treat a report of unethical or illegal conduct as confidential, consistent with the need to investigate and prevent or correct the action. Reporting individuals may be expected to cooperate in internal investigations of misconduct.

No Retaliation

An individual making a report will not be discharged, threatened, harassed, or discriminated against for reporting in good faith what he or she perceives to be wrongdoing, violations of law, or unethical conduct or for taking part in an investigation of such activity. Any person who retaliates against an individual for reporting or participating in an investigation of illegal or improper activity will be subject to disciplinary action.