Audubon Neighborhood Association

Whistleblower Policy

Policy
Audubon Neighborhood Association (ANA) requires board members, committee members, task force members and employees to observe high standards of business and personal ethics in the conduct of their duties and responsibilities, and to comply with all applicable laws and regulatory requirements.

Reporting Responsibility
ANA encourages board members, residents and employees to share their questions, concerns, suggestions, or complaints regarding the organization and its operations with someone who can address them properly. In most cases, staff or a board member should present his or her concerns to the board president. Staff is generally in the best position to address a resident's area of concern; however, if a board member is not comfortable speaking with the Board Chair or is not comfortable with the Board Chair's response, or if a resident is not comfortable speaking with staff, they are encouraged to speak with anyone on the board with whom they are comfortable in approaching.

No Retaliation
No board member, task force member, committee member, or employee who in good faith reports a violation of a law or regulation requirement shall suffer harassment, retaliation, or adverse employment consequence. An employee who retaliates against someone who has reported a violation in good faith is subject to discipline up to and including termination of employment. This Whistleblower Policy is intended to encourage and enable persons to raise serious concerns within ANA prior to seeking resolution outside ANA.

Compliance Committee
ANA will choose two board members, as well as the board President, who will act as ANA's Compliance Committee. The Compliance Committee is responsible for investigating and resolving all employee complaints and allegations concerning violations. Any board member who is part to a complaint may not serve on the Compliance Committee.

If the complaint involves both an employee and the board President, the Executive Committee will handle the duties of the Compliance Committee.

Accounting and Auditing Matters
The Executive Committee of the Board of Directors shall address all reported concerns or complaints regarding corporate accounting practices, internal controls or auditing. The Compliance Committee shall immediately notify the Executive Committee of any such complaint and work with the Committee until the matter is resolved.

Requirement of Good Faith
Anyone filing a complaint concerning a violation or suspected violation of the law 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.

Confidentiality
Suspected violations may be submitted on a confidential basis by the complainant or may be submitted anonymously. Reports of suspected violations will be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation.

Handling of Reported Violations
The Compliance Committee will acknowledge receipt of the reported 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.

Adopted by the Audubon Neighborhood Association Board of Directors
12.27.21