

# WHISTLEBLOWER PROTECTION POLICY

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*adopted by the Chi Phi Educational Trust on June 12, 2009*

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- I. **Introduction:** Chi Phi expects all staff, Trustees, Governors and Grand Council members to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. As employees, officers, members of the Grand Council, Governors, Trustees and representatives of Chi Phi, we must practice honesty and integrity in fulfilling our responsibilities and comply with all applicable laws and regulations. Set forth below is the policy of the Chi Phi Fraternity and Chi Phi Educational Trust with respect to reporting good-faith concerns about the legality or propriety of the actions or plans of the Fraternity and Trust.
- II. **Whistleblower:** A “whistleblower” under this policy is any employee, officer or board member of the Chi Phi Fraternity, Chi Phi Board of Governors or the Chi Phi Educational Trust who reports, in accordance with this Policy, conduct or a practice that he/she reasonably and in good faith believes is in violation of applicable law, regulations, or Fraternity or Trust policies. The whistleblower is not required or permitted to investigate the activity or to determine fault or corrective measures; as appropriate, the Executive Director of the Fraternity, members of the Grand Council, Trustees of the Educational Trust and/or members of the Board of Governors of the Educational Trust are charged with such responsibilities.
- III. **Reporting of Concerns or Complaints:** If an individual has knowledge of, or a reasonable, good-faith belief that, unlawful or fraudulent activity has occurred or is occurring, the individual is to report it to any of the following who is not the offending person: the Executive Director of the Fraternity, the Grand Alpha, the Chairman of the Educational Trust, or the Grand Eta. The reporting individual must exercise sound judgment to avoid baseless allegations. An individual who intentionally makes a false report may be subject to discipline, up to and including termination, in the case of employees and removal from office in the case of Grand Council members, Governors, Trustees and other volunteers.
- IV. **Reportable Activities:** Examples of activities that may be reported under this policy are violations of federal, state or local laws or regulations and violations of Fraternity or Trust policies, including fraudulent financial reporting or violations of accounting or financial policies.
- V. **Protection.** Whistleblower protections are provided in two important areas -- confidentiality and against retaliation. Insofar as consistent with a thorough and appropriate investigation or the requirements of law, the confidentiality of the whistleblower will be maintained. Any whistleblower who believes he/she has been or is being subjected to (or has witnessed or otherwise has knowledge of) retaliatory treatment should immediately report it in the manner described above. Retaliatory conduct is grounds for immediate discipline, up to and including

termination or removal. The right of a whistleblower for protection against retaliation does not include immunity for any personal wrongdoing that is alleged and investigated.

## VI. Questions & Annual Review

- A. Employees with questions regarding this policy should contact the Executive Director of the Fraternity.
- B. Trustees and Governors with questions regarding this policy should contact the Trust Chairman.
- C. Grand Council members with questions regarding this policy should contact the Grand Alpha.
- D. To honor the purpose and spirit of this policy, all Grand Council members, Governors, Trustees, officers and staff shall review and acknowledge their understanding of this policy on an annual basis.

## Acknowledgement

I HEREBY CONFIRM that I have read and understand this Whistleblower Protection Policy and will strive to uphold it to the best of my ability.

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Signature

Date