

Policy Type: Governance Process

Whistleblower Policy

(GP-16)

The purpose of the Whistleblower Policy is to outline TCN's practice regarding complaints of violations of honesty or integrity in fulfilling the organization responsibilities in compliance with all applicable laws and regulations and in keeping with the organization's policies and procedures.

Responsibilities:

All officers, directors, and employees will observe high standards of business and personal ethics in the conduct of their duties and responsibilities. All officers, directors, and employees will comply with this policy and report violations or suspected violations in accordance with this policy.

The TCN Compliance Officer, any Active or Emeritus past president of the board, is responsible for oversight in investigating and resolving all reported complaints and allegations concerning violations of laws, regulations, policies or procedures and shall advise the Board of Directors of all complaints. The Compliance Officer is required to report to the Board at least annually on compliance activity. The President will appoint annually the Compliance Officer within 30 days after each national conference.

Anyone filing a complaint concerning a violation or suspected violation of the Code is responsible for acting in good faith and having 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 with knowledge of their falsehood will be viewed as a serious disciplinary offense.

Procedures:

1. Reporting Violations

In most cases, the Chief Executive Officer is in the best position to address an area of concern. Staff who are not comfortable discussing suspected violations with the CEO or not satisfied with the CEO's response are encouraged to speak with the Compliance Officer directly. The CEO is required to report suspected violations to the Compliance Officer who has specific and exclusive responsibility to investigate all reported violations.

2. No Retaliation

No officer, director, or employee who in good faith reports a violation 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 employees and others to raise serious concerns within the organization prior to seeking resolution outside the organization.

3. Accounting and Auditing Matters

The Compliance Officer, any active or emeritus past president of the Board of Directors, shall address all reported concerns or complaints regarding corporate accounting practices, internal controls and auditing. The Compliance Officer shall immediately notify the Board of any such complaint and work with the board until the matter is resolved.

4. Handling of Reported Violations

The Compliance Officer will notify the sender and acknowledge receipt of the reported violation or suspected violation within five business days. All reports will be promptly investigated and appropriate corrective action will be taken if warranted by the investigation. Violations or suspected violations may be submitted on a confidential basis by the complainant or may be submitted anonymously. Reports of violations or suspected

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violations will be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation.

Revised: 11-4-2010
Monitoring Method: Board Self-Assessment
Monitoring Frequency: Spring