

Beta Alpha Psi Whistleblower Policy



General

Beta Alpha Psi requires directors, other volunteers, and employees to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. Employees and representatives of the organization must practice honesty and integrity in fulfilling their responsibilities and comply with all applicable laws and regulations.

The objectives of the Beta Alpha Psi Whistleblower Policy are to establish policies and procedures for:

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

Reporting Responsibility

Each director, volunteer, and employee of Beta Alpha Psi has an obligation to report in accordance with this Whistleblower Policy (a) questionable or improper accounting, reporting, or auditing matters, and (b) violations and suspected violations of Beta Alpha Psi's Constitution and Bylaws or applicable laws and regulations (hereinafter collectively referred to as Concerns).

Authority of Governance Task Force

All reported Concerns will be forwarded to the Governance Task Force in accordance with the procedures set forth herein. The Governance Task Force shall be responsible for investigating, and making appropriate recommendations to the Board of Directors, with respect to all reported Concerns.

No Retaliation

This Whistleblower Policy is intended to encourage and enable directors, volunteers, and employees to raise Concerns within the Organization for investigation and appropriate action. With this goal in mind, no director, volunteer, or employee who, in good faith,

reports a Concern shall be subject to retaliation or, in the case of an employee, adverse employment consequences. Moreover, a volunteer or employee who retaliates against someone who has reported a Concern in good faith is subject to discipline up to and including dismissal from the volunteer position or termination of employment.

Reporting Concerns

Employees

Employees should first discuss their Concern with their immediate supervisor. If, after speaking with his or her supervisor, the individual continues to have reasonable grounds to believe the Concern is valid, the individual should report the Concern to the Executive Director or the Chair of the Governance Task Force. In addition, if the individual is uncomfortable speaking with his or her supervisor, or the supervisor is a subject of the Concern, the individual should report his or her Concern directly to the Chair of the Governance Task Force.

If the Concern was reported verbally to the Executive Director, the reporting individual, with assistance from the Executive Director, shall reduce the Concern to writing. The Executive Director is required to promptly report the Concern to the Chair of the Governance Task Force, who has specific and exclusive responsibility to investigate all Concerns. If the Executive Director, for any reason, does not promptly forward the Concern to the Governance Task Force, the reporting individual should directly report the Concern to the Chair of the Governance Task Force. Contact information for the Chair of the Governance Task Force may be obtained through the Beta Alpha Psi website (www.bap.org). Concerns may also be submitted anonymously. Such anonymous Concerns should be in writing and sent directly to the Chair of the Governance Task Force.

Directors and Other Volunteers

Directors and other volunteers should submit Concerns in writing directly to the Chair of the Governance Task Force or Executive Director.

Handling of Reported Violations

The Governance Task Force shall address all reported Concerns. The Chair of the Governance Task Force shall immediately notify the Governance Task Force, the President, the Executive Director, and the Chair of the Finance Task Force of any such report. The Chair of the Governance Task Force 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 Governance Task Force, and appropriate corrective action will be recommended to the Board of Directors, 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 Governance Task Force has the authority to retain outside legal counsel, accountants, private investigators, or any other resource deemed necessary to conduct a full and complete investigation of the allegations.

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 Constitution and Bylaws. 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, up to and including dismissal from the volunteer position or termination of employment.

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, up to and including termination of employment.