

Coast Guard Foundation
Non-Retaliation (Whistleblower) Policy

Adopted December 29, 2008

Updated February 4, 2016

General

All directors, volunteers, and employees are expected to observe the highest standards of business and personal ethics in the conduct of their duties and responsibilities. They must also practice honesty and integrity in fulfilling their responsibilities and comply with all applicable laws and regulations. The support of all is necessary to achieve compliance with these requirements.

This policy was developed to direct the receipt, retention and treatment of complaints received related to accounting, internal controls, auditing matters, or any other questionable business practices on behalf of the Coast Guard Foundation. The submission of concerns regarding any questionable business practices by employees and volunteers will be kept confidential and anonymous to the utmost extent possible.

Reporting Responsibility

It is the policy of the Coast Guard Foundation not only to promote the highest ethical standards but also to encourage its volunteers and employees to i) raise good faith concerns regarding suspected violations of this or other Coast Guard Foundation policies on the part of those who act for, on behalf of, or with respect to the Coast Guard Foundation, and (ii) facilitate cooperation in any inquiry or investigation by the Coast Guard Foundation, a court, agency, law enforcement or other governmental body, without fear of retaliation.

Therefore, each employee and volunteer has an affirmative obligation to report the following in accordance with this Whistleblower Policy (a) any questionable or improper accounting or auditing matters, and (b) actual or suspected violations of accounting, internal control, or auditing practices or policies (herein (a) and (b) collectively will be referred to as “Concerns”).

No Retaliation

No director, volunteer, or employee who in good faith reports a Concern shall suffer harassment, retaliation or adverse employment consequence. Any employee or volunteer who believes that he or she has been subjected to any form of retaliation as a result of reporting a suspected “concern”, or having cooperated in an inquiry or investigation, should immediately report the retaliation to his or her immediate supervisor or the Chair of the Audit Committee. Supervisors who receive complaints of retaliation must immediately inform the Chair of the Audit Committee.

Any volunteer or employee who, upon appropriate investigation, is found to have retaliated against anyone who has reported a concern in good faith, will be subject to dismissal from their volunteer role or disciplinary action, including possible termination of employment for employees. In addition, federal, state or local law may result in civil or criminal action against such persons separate from any action undertaken by the Coast Guard Foundation.

Authority of the Audit Committee

All reported Concerns will be forwarded to the Audit Committee in accordance with the following procedures. The Audit Committee shall be responsible for investigating and making appropriate recommendations to the Foundation Executive Board with the respect to all reported Concerns. The Chair of the Audit Committee is required to report to the Audit Committee at least annually on compliance issues.

The Audit Committee 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.

How to Report 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, or 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, in writing, directly to the Chair of the Audit Committee.

If the Concern was reported verbally to their immediate supervisor, the reporting individual shall reduce the Concern to writing. The immediate supervisor is required to promptly report the Concern to the Chair of the Audit Committee which has specific and exclusive responsibility to investigate all Concerns. If the immediate supervisor, for any reason, does not promptly forward the Concern to the Audit Committee, the reporting individual should directly report the Concern to the Chair of the Audit Committee.

Directors and Volunteers

Directors and volunteers should submit Concerns in writing to the Chair of the Audit Committee.

Handling of Reported Violations

The Chair of the Audit Committee shall immediately notify the Audit Committee and the President of reported Concerns. The Chair of the Audit Committee 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 Audit Committee, and appropriate corrective action will be recommended to the Foundation Executive Board, 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.

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 Codes. The act of making allegations that prove to be unsubstantiated, and that prove to have been made maliciously, recklessly, or with the knowledge that the allegations are false, may subject the individual to disciplinary action.

Confidentiality

All reports made through the mechanisms established under this Policy will be treated as confidential to the utmost extent possible, consistent with the need to conduct an adequate investigation. Reports of suspected violations of law or policy are taken seriously, and will be investigated promptly with a full and fair investigation.

Disclosure of reports of Concerns to individuals not involved in the investigation may result in disciplinary action.