

## Sons of Union Veterans of the Civil War Whistleblower Policy

The Council of Administration requires all elected officers, committee chairmen, appointed staff employees, volunteers, and members of the Sons of Union Veterans of the Civil War, hereafter known as the SUVCW, to observe the highest standards of business and personal ethics in the conduct of their duties and responsibilities. As the representatives of SUVCW they must practice honesty and integrity in fulfilling their responsibilities and comply with all applicable laws and regulations.

- **The objectives of the SUVCW Whistleblower Policy are to establish policies and procedures for:**
  1. The submission of concerns regarding questionable accounting or audit matters by officers, committee chairmen, committee members, senior staff, employees, and other stakeholders of SUVCW, on a confidential and anonymous basis.
  2. The receipt, retention, and treatment of complaints received by the SUVCW regarding accounting, internal controls, or auditing matters.
  3. The protection of officers, committee chairmen, committee members, senior staff, employees, and other stakeholders reporting concerns from retaliatory actions.
  
- **Reporting Responsibilities**
  1. Each officer, committee chairman, committee member, senior staff, employee and other stakeholder of SUVCW has an obligation to report in accordance with this Whistleblower Policy
    - (a) Questionable or improper accounting or auditing matters.
    - (b) Violations and suspected violations of the SUVCW regulations
  
- **Investigating Authority**
  1. Allegations, of alleged wrong doing should be reported in accordance with the Sons of Union Veterans of the Civil War Constitution and Regulations Chapter IV, Discipline, Articles 3 through 27.
  
- **A Zero tolerance policy toward retaliation is hereby adopted**
  1. This Whistleblower Policy is intended to encourage and enable officers, committee chairmen, committee members, senior staff, employees and other stakeholders to raise Concerns within SUVCW for appropriate action. With this goal in mind, no officer, committee chairman, committee member, senior staff, employee or other stakeholder who, in good faith, who raises a concern shall be subject to retaliation.,
  
- **Procedures for Reporting Concerns**

### **Independent Contractors / Employees**

1. Independent Contractors and 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 National Counselor. 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 National Counselor.
2. If the individual is uncomfortable speaking with his or her supervisor, or the National Counselor, the individual should report his or her Concern directly to the Senior Vice Commander in Chief
3. If the Concern was reported verbally to the National Counselor, the reporting individual, with assistance from the Assistant National Counselor shall reduce the Concern to writing. The National Counselor is required to promptly report each Concern to the Commander – in - Chief and the Council of Administration, in Executive Session. If the National Counselor, for any reason, does not promptly forward the Concern to the Commander – in - Chief and Council of Administration, the reporting individual should directly report the Concern to the Commander – in - Chief. Contact information for the all the named positions in this policy may be obtained from the National SUVCW website. Concerns may also be submitted anonymously. Such anonymous Concerns should be in writing and sent directly to the National Counselor

- **Acting in Good Faith**

1. 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 SUVCW Constitution and Regulations. 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 in accordance with the SUVCW Constitution and Regulations Chapter IV, Discipline Article 3 – 27.

- **The handling and processing of reported concerns**

1. The handling and reporting of concerns are as described In Chapter IV of the Constitution and Regulations of the Sons of Union Veterans for members and as described in the aforementioned section of this policy INDEPENDENT CONTRACTORS / EMPLOYEES for those contractors / employees.

- **Maintaining Confidentiality**

1. All allegations, evidence, and testimonies presented to the SUVCW Hearing Councils, or to the Council of Administration as described in Article 6mbm Articles 11, and Article 17, will remain as confidential as possible until a finding of guilt has been determined. At that time, the finding of the hearing council will be published for dissemination to the membership in accordance with the Constitution and Regulation of the Sons of Union Veterans of the Civil War Chapter IV, Discipline, Article 27