

## J.R.S. Biodiversity Foundation Whistleblower Policy

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FEBRUARY 2015

### **GENERAL PRINCIPLES**

All trustees and officers of the J.R.S. Biodiversity Foundation (“Foundation”) and any employees of the Foundation (referred to for purposes of this Policy as “Staff”) are expected to ensure that the Foundation and the individuals associated with it will comply with high standards in financial accounting and reporting, and engage in lawful and ethical behavior. This Policy is intended to remind these individuals of this expectation, to encourage all to report any concerns about possible violations, to lay out procedures for reporting and investigating complaints, and to describe the protections afforded under this Policy. The Foundation Board of Trustees will oversee this Policy.

### **COMPLAINTS**

If any trustee, officer, or Staff member knows or has a reasonable belief that persons associated with the Foundation have engaged or plan to engage in illegal or unethical conduct in connection with the Foundation’s financial resources or operations, such person is expected to file a complaint immediately.

### **PROCEDURE FOR FILING COMPLAINTS**

Complaints may be reported on a confidential, anonymous basis, orally or in writing, giving as much detail as possible, to the President of the Foundation. Contact information is appended to this Policy. The President, upon receiving a verbal complaint, will promptly prepare a written summary of the complaint, including as much detail as possible.

#### *Handling of Complaints Received by the Foundation*

- All non-anonymous complaints will be acknowledged promptly by the individual receiving the complaint.
- The individual receiving the complaint, if not the President, will report it to the President, unless the complaint concerns the President, in which case the complaint will be reported to another Board member.
- The complaint will be reviewed, possibly with counsel, and investigative action will be undertaken as promptly as possible.
- The President, in consultation with another Board member, will decide on further actions to be taken, including additional investigation and/or legal or disciplinary action.
- The President will report to the Board any complaint that has been determined to be credible and material. This report will generally include a copy of the complaint and the date and nature of the complaint. It will also describe the conduct and status of any investigation and any recommendations to address the complaint.

### **ACTION ON COMPLAINTS**

The Foundation will take appropriate action in response to any complaints, including disciplinary action against any person who, in the Foundation’s assessment, has engaged in unethical conduct or misconduct and, where appropriate, reporting of such misconduct to the relevant civil or criminal authorities.

## PROTECTION UNDER POLICY

The Foundation will not knowingly, with the intent to retaliate, take any action harmful to any trustee, officer, Staff member, or other complainant for:

- reporting a complaint in good faith pursuant to this Policy or to law enforcement officers, governmental agencies or bodies, or persons with supervisory authority over the complainant;
- providing in good faith information regarding a complaint to law enforcement officers, governmental agencies or bodies, or persons with supervisory authority over the complainant, or otherwise assisting in any investigation conducted by the Foundation; or
- otherwise participating or assisting in a proceeding filed or about to be filed.

Any trustee, officer, or Staff member who retaliates against another for reporting a complaint in good faith pursuant to this Policy will be subject to disciplinary action. Any trustee, officer, or Staff member who deliberately or maliciously provides false information may be subject to disciplinary action.

## CONFIDENTIALITY

In conducting its investigations and in reporting complaints, the Foundation will strive to keep as confidential as possible the identity of any complainant or any individual who provides information during an investigation, except that the Foundation may share such information as it deems necessary with appropriate Foundation personnel and advisors, or as may be required by law.

## SCOPE OF POLICY

This policy covers complaints made regarding the Foundation's financial resources or operations including grant awards, grant selection and grant oversight.

## CONTACT INFORMATION

President	Secretary	Treasurer
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