Women in Cable Telecommunications™

Whistleblower Policy Guidance for Women in Cable Telecommunications (WICT) Chapters

(Effective 1/1/2015)

Every non-profit organization (including WICT National and each of the Chapters) must adopt a Whistleblower Policy. The policy should serve three purposes: (1) it should encourage volunteer leaders to come forward with credible information regarding illegal practices or violations of adopted policies of the organization; (2) it should explicitly state that the organization will protect the individual from retaliation for coming forward with the information; and (3) it should identify the parties to whom such information can be reported.

To help your chapter remain in compliance with federal regulations that govern nonprofits, WICT National is providing you with a template Whistleblower Policy that you may personalize with your chapter's information.

You should review and vote to adopt this policy with your board of directors every year, and each volunteer leader must disclose any potential conflicts and sign where indicated on page 3. The Chapter Treasurer should collect the signed documents and provide them to the Chapter President for review.

Once signatures have been obtained from all volunteer leaders, the Chapter President should sign below and return this form to WICT National. The individual forms with signatures may be scanned and stored electronically or otherwise archived for 3 years.

Signature Joni S Pierce Date 3/16/16

Name: **Joni Pierce**

Title: **President**

Chapter Name: **Pacific Northwest**

Date shared and adopted by the Chapter Board of Directors: **3/16/16**

Email: joni_pierce@cable.comcast.com



Women in Cable Telecommunications™

[Insert Chapter Name Here]

Whistleblower Policy

1. **Reporting Responsibility.** It is the responsibility of **Pacific Northwest Chapter** volunteer leaders to report violations or suspected violations of the law or **Pacific Northwest Chapter** policy in all operations, including, but not limited to, accounting practices, internal controls and auditing, pursuant to this Whistleblower Policy.

2. **No Retaliation.** No person who in good faith reports a violation shall suffer harassment, relation or adverse consequence. A volunteer leader who retaliates against someone who has reported a violation in good faith is subject to discipline up to and including termination of chapter volunteer leadership. This Whistleblower Policy is intended to encourage and enable volunteer leaders and others to raise serious concerns within the organization prior to seeking resolution outside the organization.

3. **Reporting Violations.** Volunteer leaders should share their questions, concerns, suggestions or complaints with someone who can address them properly. In most cases, a chapter president is in the best position to address an area of concern. However, if a volunteer leader is not comfortable speaking with a chapter president or not satisfied with a chapter president's response, the volunteer leader is encouraged to speak with the Vice President (VP) of Membership & Chapter Development at WICT National, who has specific and exclusive responsibility to investigate all reported violations. For suspected fraud, or if a volunteer leader is not satisfied or comfortable with the following organization's open door policy, volunteer leaders should contact the VP of Membership & Chapter Development directly.

4. **VP of Membership & Chapter Development.** The organization's VP of Membership & Chapter Development is responsible for investigating and resolving all reported complaints and allegations and shall advise the chapter advisor concerning such proceedings. If the chapter advisor is being reported, the VP of Membership & Chapter Development is responsible for advising the chapter president and ensuring the right chain of command is followed up to and including the WICT President and CEO.

5. **Acting in Good Faith.** Anyone filing a complaint concerning a violation or suspected violation under this Whistleblower Policy must be acting in good faith and have 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 that they are false will be viewed as a serious disciplinary offense.

6. **Confidentiality.** Violations or suspected violations may be submitted on a confidential basis by the complainant or may be submitted anonymously. Reports of violations will be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation.

7. **Handling of Reported Violations.** The VP of Membership & Chapter Development will notify the sender and acknowledge receipt of the reported violation or suspected violation within a reasonable amount of time. All reports will be promptly investigated and appropriate corrective action will be taken if warranted by the investigation.

My signature below indicates my receipt and understanding of this policy.

Marian Jackson 3/24/16

Signature Date

Name: MARIAN JACKSON

Title: DIR, GOVERNMENT AFFAIRS

Volunteer Leadership Position: Chapter Advisor

Chapter: **Pacific Northwest Chapter**

Email: marian.jackson@charter.com