

Saramana Chapter Florida Society Sons of the American Revolution

Whistleblower Policy

General

The Saramana Chapter Code of Organization Conduct (hereinafter referred to as the Code) requires officers, governors, and committee chairmen to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. The same high standards are expected of all members and volunteers. Officers, governors, committee chairmen, and committee members are representatives of the Saramana Chapter and must practice honesty and integrity in fulfilling their responsibilities and comply with all applicable laws and regulations.

The objectives of the Saramana Chapter Whistleblower Policy are to establish policies and procedures for:

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

Reporting Responsibility

Each officer, committee chairman, committee member, and other stakeholder of the Saramana Chapter has an obligation to report in accordance with this Whistleblower Policy (a) questionable or improper accounting or auditing matters, and (b) violations and suspected violations of the Saramana Chapter's Organization's Code (hereinafter collectively referred to as Concerns).

Authority of Saramana Compliance Officer

The Saramana Compliance Officer is appointed by the Chapter President and his term will end simultaneously with the term of the Chapter President. All reported Concerns will be forwarded to the Saramana Compliance Officer in accordance with the procedures set forth herein. The Saramana Compliance Officer shall be responsible for investigating, and making appropriate recommendations to the Saramana Audit Committee and the Saramana Board of Governors. If the Saramana Compliance Officer is the subject of the Concern, the Saramana Audit Committee Chairman will receive the reported Concerns, and be responsible for investigating, and making appropriate recommendations to the Audit Committee and the Saramana Board of Governors.

No Retaliation

This Whistleblower Policy is intended to encourage and enable officers, committee chairmen, committee members, and other stakeholders to raise Concerns within the Saramana Chapter for investigation and appropriate action. With this goal in mind, no officer, committee chairman, committee member, or other stakeholder who, in good faith, reports a Concern shall be subject to retaliation. Moreover, a Saramana Chapter member who retaliates against someone who has reported a Concern in good faith is subject to discipline consistent with the Saramana Chapter Constitution and Bylaws.

Reporting Concerns

Saramana Chapter Members and Other Stakeholders

Saramana members and other stakeholders should submit Concerns in writing directly to the Saramana Compliance Officer, or in the case of a Concern about the Compliance Officer, to the Saramana Audit Committee Chairman. Contact information for the Saramana Compliance Officer and Audit Committee Chairman may be obtained from the Saramana website.

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 Saramana Organization Code. 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 consistent with the Saramana Constitution and Bylaws.

Handling of Reported Violations

The Saramana Compliance Officer shall address all reported Concerns. The Saramana Compliance Officer shall immediately notify the Saramana Audit Committee Chairman and Chapter President of any such reported Concern. The Saramana Compliance Officer 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 Saramana Compliance Officer, and appropriate corrective action will be recommended to the Saramana Audit Committee Chair and the Board of Governors, 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 Saramana Compliance Officer, with the concurrence of the Board of Governors, has the authority to obtain resources deemed necessary to conduct a full and complete investigation of the allegations.

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 consistent with the Saramana Constitution and Bylaws.