

## **Leukemia Research Foundation WHISTLE BLOWER POLICY**

*(effective January 1, 2012)*

This Handbook ("Handbook") requires officers, employees and volunteers to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. As employees and representatives of the LRF, we must practice honesty and integrity in fulfilling our responsibilities and comply with all applicable laws and regulations.

It is the responsibility of all employees to comply with the Handbook and to report violations or suspected violations in accordance with this Whistleblower Policy. No one who in good faith reports a violation of the Handbook's policies shall suffer harassment, retaliation or adverse employment consequence. An employee who retaliates against someone who has reported a violation in good faith is subject to discipline up to and including termination of employment. This Whistleblower Policy is intended to encourage and enable employees and others to raise serious concerns within the LRF prior to seeking resolution outside the LRF.

The LRF's "open door" policy recommends that employees share their questions, concerns, suggestions or complaints with someone who can address them properly. In most cases, an employee's supervisor is in the best position to address an area of concern. However, if you are not comfortable speaking with your supervisor or you are not satisfied with your supervisor's response, you are encouraged to speak with the Executive Director, who has specific and exclusive responsibility to investigate all reported violations. For suspected fraud, or when you are not satisfied or uncomfortable with following the LRF's open door policy, individuals should directly contact the LRF's Chair of the Human Resources/Organizational Development Sub-Committee of the Board of Directors.

The LRF's Executive Director is responsible for investigating and resolving all reported complaints and allegations concerning violations of the Handbook's policies and, at his/her discretion, shall advise the Board Chair.

All concerns and complaints should be submitted in writing and signed by the person making the report. The Human Resources/Organizational Development Sub-Committee of the Board shall address all reported concerns or complaints regarding corporate accounting practices, internal controls or financing. The Executive Director shall immediately notify the Sub-Committee of any such complaint and work with the committee until the matter is resolved.

Anyone filing a complaint concerning a violation or suspected violation of the Handbook's policies must be acting in good faith and have reasonable grounds for believing the information disclosed indicates a violation of the Handbook's policies. Any allegations that prove not to be substantiated and which prove to have been made maliciously or knowingly to be false will be viewed as a serious disciplinary offense.

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