**Whistleblower Protection Policy**

The ATRX Research Alliance (ARA) requires board members, program officers, staff and volunteers to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. As employees and representatives of ARA, we must practice honesty and integrity in fulfilling our responsibilities and comply with all applicable laws and regulations.

**Reporting Responsibility**

This Whistleblower Policy is intended to encourage and enable employees and others to raise serious concerns internally so that ARA can address and correct inappropriate conduct and actions. It is the responsibility of all board members, program officers, staff and volunteers to report concerns about violations of ARA’s code of ethics or suspected violations of law or regulations that govern ARA’s operations.

**No Retaliation**

It is contrary to the values of ARA for anyone to retaliate against any board member, program officer, staff or volunteer who in good faith reports a suspected violation of any regulation governing the operations of ARA. An individual who retaliates against someone who has reported a violation in good faith is subject to discipline up to and including termination or dismissal.

**Reporting Procedure**

ARA has an open door policy and suggests that individuals share their questions, concerns,

suggestions or complaints with a board member, program officer or with the Managing Director.

Program officers are required to report concerns about suspected ethical and legal violations in writing to ARA’s Managing Director, who is responsible for ensuring that all complaints are investigated and resolved. The Managing Director may appoint an individual to investigate a complaint. The Managing Director shall immediately notify the Board of Directors of any concerns or complaints regarding corporate accounting practices, internal controls or auditing and work with the Board of Directors until the matter is resolved. Questions, concerns or complaints involving the Managing Director should be directed to the Board of Directors Chairperson.

**Acting in Good Faith**

Anyone filing a written complaint concerning a violation or suspected violation 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 knowingly to be false will be viewed as a serious disciplinary offense.

**Confidentiality**

Reports of violations or suspected violations will be kept confidential to the extent possible,

consistent with the need to conduct an adequate investigation.

**Handling of Reported Violations**

ARA’s Managing Director will notify the person who submitted a complaint and acknowledge

receipt of the reported violation or suspected violation. All reports will be promptly investigated

and appropriate corrective action will be taken if warranted by the investigation.

Policy approved by ARA’s Board of Directors on <DATE>.

References

1. The Sarbanes-Oxley Act includes two provisions that apply to nonprofit corporations: the

whistleblower protection and document retention provisions.

2. National Council of Nonprofits, Whistleblower Protections for Nonprofits,

https://www.councilofnonprofits.org.

3. IRS Form 990, Part VI, Section B.13, “Did the organization have a written whistleblower

policy?”