



## Society of Women Engineers Whistleblower Policy and Procedure

### **I. WHISTLEBLOWER POLICY**

#### **PURPOSE / BACKGROUND**

The Society of Women Engineers (SWE) requires Officers, Directors, leaders, members, volunteers, agents, and employees to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. Representatives of the organization must practice honesty and integrity in fulfilling their responsibilities and comply with all applicable laws and regulations.

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

- The submission of concerns regarding questionable accounting or auditing matters by employees, directors, officers, and other stakeholders of the organization, on a confidential and anonymous basis.
- The receipt, retention, and treatment of complaints received by the organization regarding accounting, internal controls, or auditing matters.
- The protection of directors, volunteers and employees reporting concerns from retaliatory actions. This Whistleblower Policy is intended to encourage and enable members, agents, and employees to raise concerns within the Society for investigation and appropriate action. With this goal in mind, no member, agent, or employee who, in good faith, reports a concern shall be subject to retaliation or, in the case of an employee, adverse employment consequences.

#### **APPLICABILITY OF THIS POLICY**

Society management at all levels is responsible for safeguarding financial and physical assets and being alert to possible exposures, errors, and irregularities. Management must be aware of internal control weaknesses which can lead to or permit misuse, misappropriation, or destruction of assets. This Society policy regarding the safeguarding of assets and the investigating, processing, and reporting of suspected misappropriations and similar irregularities applies to all areas of the Society. These include the administration, SWE groups, and agents of the Society conducting Society business, and any wholly-owned subsidiaries of the Society.

#### **POLICY**

It is the policy of the Society to ensure the protection of Society assets and to ensure that such assets are not misappropriated, misused, damaged, or destroyed and to provide a policy for the investigations of known or suspected misappropriations and other irregularities. The objectives of investigating suspected misappropriations and similar irregularities are to determine whether the suspected irregularity occurred; to ascertain the source and amount of funds involved; to identify the individuals responsible for the loss; to adequately document fraudulent activities; and to provide a sound basis for any subsequent corrective action.

The Society of Women Engineers is committed to facilitating open and honest communications relevant to its governance, finances, and compliance with all applicable laws and regulations. It is important that the Society be advised about unlawful or improper behavior including, but not limited to, any of the following conduct:

- Accounting and Auditing Matters;
- Falsification of Contracts, Reports or Records
- Fraud
- Improper Giving or receiving of Gifts
- Improper Supplier or Contractor Activity
- Misuse of Donor Funds
- Theft / Embezzlement
- Waste, Abuse or Misuse of Society Resources

Reports of concerns, and investigations pertaining thereto, shall be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation.



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### **ORGANIZATIONAL RESPONSIBILITIES**

It is the responsibility of all directors, officers, members, agents, and employees to report violations or suspected violations in accordance with this Whistleblower Policy. The Society's Policy Administrator is the Society's President Elect, hereto referred to as Financial Ombudsperson. If the President-Elect is unable to serve for any reason (including if they are the subject of a complaint), then an elected director of the SWE Board of Directors will be designated by the SWE President to serve as the Financial Ombudsperson.

The Financial Ombudsperson is responsible for investigating and resolving all reported complaints and allegations concerning violations of this policy and, at their discretion, shall advise the President and/or the SWE Audit Committee. The Financial Ombudsperson has direct access to the SWE Audit Committee.

The Financial Ombudsperson will notify the sender and acknowledge receipt of the reported violation or suspected violation within five (5) business days. All reports will be promptly investigated and appropriate corrective action will be taken if warranted by the investigation.

The Financial Ombudsperson shall immediately notify the SWE Audit Committee of any reported concerns or complaints regarding corporate accounting practices, internal controls, or auditing. The SWE Audit Committee shall address all such complaints and work with the Financial Ombudsperson until the matter is resolved. If the complaint involves the Audit Committee or its leadership, the Financial Ombudsperson need not involve the Audit Committee in the investigation.

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. At the conclusion of the investigation, the Financial Ombudsperson will notify the complainant that the complaint is closed, without detail about any actions taken related to the complaint.

### **VIOLATIONS OF THIS POLICY**

The Society considers acts of malfeasance, fraud, or misrepresentation committed by its staff, members, and agents to be reprehensible and, in response, will take all disciplinary or other action that the Society deems appropriate. These sanctions may include, but are not limited to:

- Removal of access to Society funds and assets
- Removal from elected or appointed office
- Removal from board and / or committee duties

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 offense and may result in action being taken by the Society.

No individual, who in good faith reports a violation under this policy, shall suffer harassment, retaliation or adverse consequences. A member, agent or employee who retaliates against someone who has reported a concern in good faith is subject to discipline up to and including dismissal from the volunteer position or termination of employment. This Whistleblower Policy is intended to encourage and enable individuals to raise serious concerns within the Society prior to seeking resolution outside the organization.

### **DEFINITIONS FOR THIS POLICY**

**Society** refers to the Society of Women Engineers (SWE).

**Officer** refers to individuals elected to the Society of Women Engineers Board of Directors as defined in the SWE Bylaws.



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**Director** refers to individuals elected to the Society of Women Engineers Board of Directors as defined in the SWE Bylaws.

**Member** refers to a person of any grade of membership in the Society.

**Agent** refers to an external organization or individual hired by the Society to conduct business on behalf of the Society.

**Employee** refers to individuals who are employed by the Society.

**Financial Ombudsperson** refers to the President Elect or an elected director of the SWE Board of Directors, specifically charged with the responsibility to investigate reported complaints, reports findings, and helps to achieve equitable settlement for the Society of Women Engineers.

**Complainant** refers to the person submitting the whistleblower complaint.

**Counsel** refers to lawyers hired by the Society to consult and represent SWE regarding legal matters.

### II. PROCEDURE FOR POLICY

The Society maintains an open-door policy and suggests that members, employees, and agents share their questions, concerns, suggestions, or complaints with someone who can address them properly. In most cases, the leader of the SWE group is in the best position to address a member's area of concern. However, if a member is not comfortable speaking with their SWE leader or if the member is not satisfied with their response, the member is encouraged to speak to any Board of Directors member. Employees and agents should immediately seek out the Financial Ombudsperson.

If for any reason the individual does not believe these channels of communication are adequate, the concern should be reported immediately to the Financial Ombudsperson. Anyone filing a complaint concerning a violation or suspected violation of this 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 knowingly to be false will be viewed as a serious disciplinary offense. At the conclusion of the investigation, the Financial Ombudsperson will notify the complainant that the complaint is closed, without detail about any actions taken related to the complaint.

Anonymous reports will be accepted, and all reports will be handled on a confidential basis to the extent possible. The contact information for the Financial Ombudsperson is below.

Mark envelope: "TO BE OPENED BY ADDRESSEE ONLY PERSONAL AND CONFIDENTIAL"

The Financial Ombudsperson will coordinate the investigation and the Society of Women Engineers will take appropriate action as it deems justifiable by the circumstances.

**Financial Ombudsperson  
The Society of Women Engineers  
130 East Randolph Street, Suite 3500  
Chicago, Illinois 60601**



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### **REPORTING WHISTLEBLOWER RETALIATION**

Information must be disclosed in writing directly to the Financial Ombudsperson addressed to:

**Financial Ombudsperson  
The Society of Women Engineers  
130 East Randolph Street, Suite 3500  
Chicago, Illinois 60601**

In the event the whistleblower information concerns the Financial Ombudsperson's Office or the adverse action is alleged to have been committed by the Financial Ombudsperson's Office, the complaint shall be filed with the Society Counsel addressed to:

**Society Counsel  
The Society of Women Engineers  
130 East Randolph Street, Suite 3500  
Chicago, Illinois 60601**

The Society Counsel shall be responsible for receiving, investigating, and reporting to the appropriate authorities at the conclusion of any investigation arising from any disclosure covered under this policy and otherwise performing the duties of the Financial Ombudsperson as provided herein.

It is the policy of the Society to encourage members, agents, and employees to disclose whistleblower information.

Notwithstanding any other grievance procedure which may be applicable, an individual who believes that they have been subjected to adverse action as a result of engaging in activity protected by Whistleblower Protection Act, shall file a complaint with the Financial Ombudsperson. This complaint must be made in writing and must be filed with the Financial Ombudsperson within twenty (20) days of the alleged adverse action. Upon receipt of a retaliatory action complaint; or upon referral of a grievance which contains allegations of whistleblower retaliation, the Financial Ombudsperson shall conduct an investigation of the complaint of retaliation. The Financial Ombudsperson shall complete such investigation within thirty (30) days of receipt of the complaint, except the Financial Ombudsperson shall have the authority to extend such time for reasonable cause.

Upon completion of the investigation, the Financial Ombudsperson shall present the Society President as to whether or not there are reasonable grounds to believe that a retaliatory action has occurred or is occurring and where appropriate, make recommendations to remedy the prohibited action. In the event, the complaint pertains to the Society President, the Financial Ombudsperson shall present the Society Counsel with the written findings of the investigation.

The Society Board of Directors shall thereafter render a decision as to the relief to be afforded, which shall be the final stage of this procedure.

Date	Board of Directors Motion	Version	Change(s) Log Summary
27 June 2006	0604	0	Initial release.
09 September 2011	B1214	1	Update SWE headquarters address.
24 March 2023	B2329	2	Update SWE headquarters address. Remove reference to Regions in the United States.

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