

## **Whistleblower Protection**

The AIDS Law Project of Pennsylvania (ALPP) requires directors and employees to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. As employees and representatives of ALPP, 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 ALPP can address and correct inappropriate conduct and actions. Board members, employees, and volunteers must report to the Executive Director any concerns about violations of ALPP's policies or code of ethics, and suspected violations of law or of regulations governing ALPP operations.

### **No Retaliation**

It is contrary to the values of ALPP for anyone to retaliate against any board member, employee or volunteer who in good faith reports an ethics violation, policy violation or a suspected violation of law, such as a complaint of discrimination, or suspected fraud, or suspected violation of any regulation governing the operations of ALPP. An employee or board member who retaliates against someone who has reported a violation in good faith is subject to discipline up to and including termination of employment.

### **Reporting Procedure**

ALPP has an open-door policy and suggests that employees share their questions, concerns, suggestions or complaints with their supervisor. 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. Supervisors and managers are required to report complaints or concerns about suspected ethical and legal violations in writing to the Executive Director, who has the responsibility to investigate all reported complaints. Employees with concerns or complaints may also submit their concerns in writing directly to the President of the Board of Directors.

### **Executive Director**

ALPP's Executive Director is responsible for ensuring that all complaints about illegal or unethical conduct are investigated and resolved. The Executive Director will promptly report all to the Board of Directors all complaints and their resolution.

### **Accounting and Auditing Matters**

The Executive Director shall immediately notify the Treasurer or Chair of the Board any concerns or complaint regarding corporate accounting practices, internal controls or auditing or any other alleged financial impropriety. The Executive Director shall work with the committee until the matter is resolved. The Treasurer or Chair of the Board will report to the board, at least annually, of any compliance activity relating to any alleged financial impropriety and its resolution.

### **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**

Violations or suspected violations may be submitted on a confidential basis by the complainant. 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**

The Executive 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 the Board of Directors on January 19, 2022.**

**AIDS Law Project of Pennsylvania**

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