

PMI PHOENIX CHAPTER POLICY STATEMENT

Whistleblower Policy

Approved by Board of Directors on: 3/25/19

Purpose

PMI Phoenix Chapter is committed to the highest standards of ethical, moral and legal business conduct. In order to ensure those standards are met, PMI Phoenix Chapter fosters and encourages an atmosphere in the work place of open and honest communications. This policy establishes the process that volunteer workers of PMI Phoenix Chapter should report concerns about activities by another volunteer that may be contrary to the standards set forth above. Reporting of such activity is called whistleblowing and is encouraged. This policy also establishes the process for reviewing such reports.

Whistleblower reports may be submitted for any of the following types of activities:

- Activities that are not consistent with existing PMI Phoenix Chapter policies and/or its code of ethics and that reflect willful disregard of them
- Failure to implement, monitor and respond to financial controls in an appropriate manner
- Unlawful activity
- Activities that constitute improper conduct such as sexual harassment, favoritism, etc.
- Inappropriate relationships with vendors
- Misrepresentations of financial activity or failure to fully report activity to Chapter Directors.
- Deliberate misreporting of information to PMI Phoenix Chapter Directors.
- Fraud of any kind

Safeguards

- *Reprisals* - Reprisals for submitting a whistleblower report in the form of harassment or victimization for reporting concerns under this policy will not be tolerated.
- *Confidentiality* - Every effort will be made to treat a whistleblower's identity with appropriate regard for confidentiality.
- *Fair and timely reviews* - All whistleblower reports will be heard and evaluated fairly, objectively and in a timely manner based on documented facts and observations.
- *Anonymous reports* - This policy encourages volunteers to put their names to allegations because appropriate follow-up questions and investigation may not be possible unless the source of the information is identified. Concerns expressed anonymously will be investigated appropriately, but consideration will be given to the seriousness of the issue raised, the credibility of the concern, and the likelihood of being able to confirm the allegation from credible sources.
- *Bad Faith Allegations* - Although the volunteer is not expected to prove the absolute truth of an allegation, the whistleblower should be able to demonstrate that the report is being made in good faith and that allegations are based on a reasonable interpretation of facts and observations. Allegations that are made in bad faith and that are deemed by the Board to be frivolous and without merit will be dismissed and the whistleblower may be subject to disciplinary action.

The Process

Whistleblower reports shall be addressed to the Chapter President or his/her designee. If a designee is appointed, the name of that person will be publicized to all PMI Phoenix Chapter volunteers. This authority may be delegated to a volunteer board member. The report will be presented to the Board and the Board will define and implement an appropriate resolution. If the whistleblower was wrong about his/her assertions but the assertion was reasonable and submitted honestly and in good faith, the investigating authority will report back to the whistleblower on the findings of the review and will explain the findings.