

Whistleblower Policy

Policy Name	WEF Whistleblower Policy
Policy Category	Legal
Policy Number	2005-004
Policy Origination and Review Dates	October, 2005; July, 2009; June 2015; August, 2020
Requirements	Sarbanes-Oxley Act Requirements
Review Cycle	5 years
Legal Review Required	Yes

A. General Policy Statement

The Water Environment Federation's (WEF's) Whistleblower policy is designed to:

- 1) Encourage WEF members, volunteers and staff to come forward with credible information on illegal practices or violations of adopted policies of the organization;
- 2) Specify that WEF will protect the individual from retaliation; and
- 3) Identify to whom such information will be reported.

WEF will investigate any possible fraudulent or dishonest use or misuse of WEF resources or property, or violation of policy by trustees, volunteers, members or staff. Anyone found to have engaged in fraudulent or dishonest conduct is subject to disciplinary action by WEF up to and including civil or criminal prosecution.

B. Reporting Concerns

All members of the WEF community are encouraged to report possible fraudulent, dishonest conduct, or violation of policy. WEF members, volunteers, or customers should report concerns to the Executive Director, or a member of the Board of Trustees. Staff should follow employment policies, provided in the Employee Policy Manual, for reporting concerns/complaints regardless of whether the complaint is about staff, trustees, members, or volunteers.

C. Investigations

The Executive Director or his/her designee will maintain a written log of all whistleblower complaints including the outcome of the investigations. Investigations vary as follows:

1. Members/Executive Director/Volunteers:

The Executive Director or trustees receiving concerns/complaints will forward them to WEF's Ethics Subcommittee who will investigate complaints and may delegate such action to staff, legal counsel, or others as appropriate. The Ethics Subcommittee will report fraudulent behavior and significant violations of policy to the Board, including reporting what actions are being taken. Fraudulent behavior and significant violations of policy will be the responsibility of the Board Ethics Subcommittee to address, in consultation with the WEF Legal Counsel. For members, the Member Discipline Policy will serve to guide handling of the reported concern.

2. Staff:

As outlined in WEF Employment Policy Manual, the Executive Director will investigate concerns/complaints reported on staff and will report fraudulent behavior and significant violation of policy to the Board, including reporting what actions are being taken. Fraudulent behavior and significant violations of policy at the staff level are the responsibility of the Executive Director to address, in consultation with the WEF Legal Counsel.

D. Retaliation

WEF will use best efforts to protect whistleblowers against retaliation. WEF cannot guarantee confidentiality, however, and there is no such thing as an "unofficial" or "off the record" report. WEF will keep the whistleblower's identity confidential, unless the person agrees to be identified; identification is necessary to allow WEF or law enforcement officials to investigate or respond effectively to the report; identification is required by law; or the person accused of the fraudulent conduct is entitled to the information as a matter of legal right in disciplinary proceedings. WEF is not obligated to provide the results of the investigation to the whistleblower.

WEF staff, trustees, members, volunteers, and customers may not retaliate against a whistleblower. Whistleblowers who believe that they have been subject to retaliation may file a written complaint with the WEF Ethics Subcommittee.