

Hawai`i Association for College Admission Counseling

**WHISTLEBLOWER POLICY**

As approved by the Executive Board: effective August 29, 2011

**ARTICLE I. GENERAL**

1. Hawai`i Association for College Admissions Counseling requires Executive Board members and volunteers to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. As members and representatives of the Organization, we must practice honesty and integrity in fulfilling our responsibilities and comply with all applicable laws and regulations.

**ARTICLE II. REPORTING RESPONSIBILITY**

1. It is the responsibility of all board members, general members and volunteers to comply with and to report violations or suspected violations in accordance with this Whistleblower Policy.

**ARTICLE III. NO RETALIATION**

1. No Executive Board member, general member or volunteer who in good faith reports a violation shall suffer harassment, retaliation or adverse consequence. A member who retaliates against someone who has reported a violation in good faith is subject to discipline up to and including termination of membership. This Whistleblower Policy is intended to encourage and enable all members to raise serious concerns within the Organization prior to seeking resolution outside the Organization.

**ARTICLE IV. REPORTING VIOLATIONS**

1. Hawai`i Association for College Admissions Counseling has an open door policy and suggests that members share their questions, concerns, suggestions or complaints with someone who can address them properly. In most cases, the President is in the best position to address an area of concern. However, if you are not comfortable speaking with the President or you are not satisfied with the President's response, you are encouraged to speak with anyone on the Executive Board whom you are comfortable in approaching. Executive Board members are required to report suspected violations to HACAC's Compliance Officer, who has specific and exclusive responsibility to investigate all reported violations. For suspected fraud, or when you are not satisfied or uncomfortable with following the HACAC's open door policy, individuals should contact the Compliance Officer directly.

**ARTICLE V. COMPLIANCE OFFICER**

1. The Organization's Compliance Officer is responsible for investigating and resolving all reported complaints and allegations concerning violations and, at his discretion, shall advise the President and/or the audit committee. The audit committee shall be comprised of the following Executive Board Officers: Maui Representative, Secretary, and Past-President. The Compliance Officer has direct access to the audit committee of the Executive Board and is required to report to the audit committee at least annually on compliance activity. HACAC's Compliance Officer is the President-Elect.

#### ARTICLE VI. ACCOUNTING AND AUDITING MATTERS

1. The audit committee of the Executive Board shall address all reported concerns or complaints regarding corporate accounting practices, internal controls or auditing. The Compliance Officer shall immediately notify the audit committee of any such complaint and work with the committee until the matter is resolved.

#### ARTICLE VII. ACTING IN GOOD FAITH

1. Anyone filing a 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.

#### ARTICLE VIII. CONFIDENTIALITY

1. 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.

#### ARTICLE IX. HANDLING OF REPORTED VIOLATIONS

1. The Compliance Officer will notify the sender and acknowledge receipt of the reported violation or suspected violation within five business days. All reports will be promptly investigated and appropriate corrective action will be taken if warranted by the investigation.