

Whistleblower Protection Policy

At Myositis Support and Understanding Association, Inc. (MSU), we encourage open and honest communication in all matters. It is important to report any unlawful or improper behavior, including but not limited to any of the following conduct:

- physical, verbal, or sexual harassment
- theft
- financial reporting that is intentionally misleading
- improper or undocumented financial transactions
- improper destruction of records
- improper use of assets
- violations of MSU's conflict-of-interest policy
- any other improper occurrence regarding revenue/expenses or financial procedures

Application

This Whistleblower Protection Policy applies to all of MSU's staff, whether full-time, part-time, or temporary employees, to all volunteers, to all who provide contract services, and to all officers and board members, each of whom shall be entitled to protection.

Reporting Credible Information

A protected person shall be encouraged to report information relating to illegal practices or violations of policies of the Association (a "Violation") that such person in good faith has reasonable cause to believe is credible. Information shall be reported to the Executive Director (the "Compliance Officer") unless the report relates to the Compliance Officer, in which case the report shall be made to the Board President, who shall be responsible to provide an alternative procedure.

In the case where the report relates to the Board President when serving as the Compliance Officer, the report shall be made to the Board Vice President, who shall be responsible to provide an alternative procedure.

Anyone reporting a Violation must act in good faith, and have reasonable grounds for believing that the information shared in the report indicates that a Violation has occurred.

To report credible information, complete and submit the ["Whistleblower Report" form](#).

Investigating Information

The Compliance Officer shall, within one (1) week, investigate each such report and prepare a written report to the Board of Directors. In connection with such investigation, all persons entitled to protection shall provide the Compliance Officer with credible information. All actions of the Compliance Officer in receiving and investigating the report and additional information shall endeavor to protect the confidentiality of all persons entitled to protection.

Confidentiality

The Association encourages anyone reporting a Violation to identify himself or herself to the Compliance Officer when making a report in order to facilitate the investigation of the Violation. However, reports may be submitted anonymously when filing the "Whistleblower Report" form. Reports of Violations or suspected Violations will be kept confidential to the extent possible, with the understanding that confidentiality may not be maintained where identification is required by law or in order to enable the Association or law enforcement to conduct an adequate investigation.

Protection from Retaliation

No person entitled to protection shall be subjected to retaliation, intimidation, harassment, or other adverse action for reporting information in accordance with this Policy. Any person entitled to protection who believes that he or she is the subject of any form of retaliation for such participation should immediately report the same as a violation of and in accordance with this Policy.

Any individual within the Association who retaliates against another individual who has reported a Violation in good faith or who, in good faith, has cooperated in the investigation of a Violation is subject to discipline, including termination of employment, volunteer status, or removal from the Board of Directors.

Dissemination and Implementation of Policy

This Policy shall be disseminated in writing to all affected constituencies. The Association shall adopt procedures for implementation of this Policy, which may include:

- documenting reported Violations;
- working with legal counsel to decide whether the reported Violation requires review by the Compliance Officer or should be directed to another person or department;
- keeping the Board of Directors informed of the progress of the investigation;
- interviewing employees and volunteers;
- requesting and reviewing relevant documents, and/or requesting that an auditor or counsel investigate the complaint;
- preparing a written record of the reported Violation and its disposition, to be retained for a specified period of time.

The procedures for implementation of this Policy shall include a process for communicating with a complainant about the status of the complaint, to the extent that the complainant's identity is disclosed, and to the extent consistent with any privacy or confidentiality limitations.