



**Phi Chi Theta
Whistleblower Policy
Adopted by the Executive Council on November 25, 2008**

General

Phi Chi Theta requires executive council members, officers and employees to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. As employees and representatives of the Phi Chi Theta, we must practice honesty and integrity in fulfilling our responsibilities and comply with all applicable laws and regulations.

Reporting Responsibility

It is the responsibility of all council members, officers and employees to report ethics violations or suspected violations in accordance with this Whistleblower Policy.

No Retaliation

No council member, officer or employee who in good faith reports an ethics violation shall suffer harassment, retaliation or adverse employment consequence. An employee who retaliates against someone who has reported a violation in good faith is subject to discipline up to and including termination of employment. This Whistleblower Policy is intended to encourage and enable employees and others to raise serious concerns within Phi Chi Theta prior to seeking resolution outside Phi Chi Theta.

Reporting Violations

Phi Chi Theta has an open door policy and suggests that employees share their questions, concerns, suggestions or complaints with someone who can address them properly. In most cases, an employee's supervisor is in the best position to address an area of concern. However, 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 someone on the Executive Council. Supervisors and managers are required to report suspected ethics violations to the Phi Chi Theta'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 Phi Chi Theta's open door policy, individuals should contact Phi Chi Theta's Compliance Officer directly.

Compliance Officer

The Phi Chi Theta Compliance Officer is responsible for investigating and resolving all reported complaints and allegations concerning violations and, at his/her discretion, shall advise the Executive Director and/or the Executive Policy Board. The Compliance Officer has direct access to Phi Chi Theta auditors and is required to report to the Executive Policy Board at least annually on compliance activity. The Phi Chi Theta Compliance Officer is the chair of the audit committee.

Accounting and Auditing Matters

The audit committee 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.

Acting in Good Faith

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.

Confidentiality

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.

Handling of Reported Violations

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.

Audit Committee Compliance Officer:

Appointed Member of Executive Policy Board (see officer contact list)

Phi Chi Theta

Phi Chi Theta Management Staff

Saundra Finley

Executive Director

Phi Chi Theta

This policy supersedes any previous documents published on this issue. This policy does not however supersede any provisions in the Phi Chi Theta National Bylaws.