

# **E.O. Wilson Biodiversity Foundation Whistleblower Protection Policy**

The E.O. Wilson Biodiversity Foundation (the “Foundation”) requires directors, 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 Foundation, we must practice honesty and integrity in fulfilling our responsibilities and comply with all applicable laws and regulations.

## **Reporting Responsibility**

This Whistleblower Policy is intended to encourage and enable employees and others to raise serious concerns internally so that the Foundation can address and correct inappropriate conduct and actions. It is the responsibility of all board members, officers, employees and volunteers to report concerns about any Foundation conduct that he/she feels is unethical or a violation of law or regulations that govern the Foundation’s operations.

## **No Retaliation**

It is contrary to the values of the Foundation for anyone to retaliate against any board member, officer, employee, or volunteer who in good faith reports an ethics violation, or a suspected violation of law, such as a complaint of discrimination, or suspected fraud, or suspected violation of any regulation governing the operations of the Foundation. 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. Notwithstanding the foregoing, the right of a reporting person for protection against retaliation does not include immunity for any personal wrongdoing that may be discovered.

## **Reporting Procedure**

The Foundation has an open door policy and suggests that employees and volunteers share their questions, concerns, suggestions or complaints with their supervisor. If an employee or volunteer is not comfortable speaking with his/her supervisor or is not satisfied with his/her supervisor’s response, he/she is encouraged to speak with the President of the Foundation. Supervisors and managers are required to report complaints or concerns about suspected ethical and legal violations in writing to the Foundation’s President who has the responsibility to investigate all reported complaints. Employees and volunteers with concerns or complaints may also submit their concerns in writing directly to their supervisor or the President of the Foundation.

## **President**

The Foundation’s President is responsible for ensuring that all complaints about unethical or illegal conduct are investigated and resolved. The President will advise the Board of Directors of all complaints and their resolution, and will report not less often than annually to the Board of Directors on compliance activity relating to alleged accounting or financial improprieties.

## **Accounting and Auditing Matters**

The Foundation’s President shall immediately notify the Board of Directors of any concern or complaint reported to the President regarding corporate accounting practices, internal controls or auditing and work with the Board of Directors until the matter is resolved.

**Acting in Good Faith**

Anyone who provides a report under this policy 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 subject to discipline up to and including termination of employment.

**Confidentiality**

Violations or suspected violations may be submitted on a confidential basis by the complainant. Reports of violations or suspected violations will be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation and legal requirements for disclosure.

**Handling of Reported Violations**

The Foundation's President will notify the person who submitted a complaint and acknowledge receipt of the reported violation or suspected violation. All reports will be promptly investigated and appropriate corrective action will be taken if warranted by the investigation.

Paula J. Ehrlich, DVM, PhD  
President and CEO  
E.O. Wilson Biodiversity Foundation

Policy approved by the Board of Directors on **October 19, 2016**.