

## **Whistleblower Policy**

**Policy:** Washington Vaccine Association (the “Association”) has been established by act of the Washington Legislature for the purpose of collecting and remitting adequate funds from health carriers and third party administrators for the cost of vaccines provided to certain children of the state of Washington. The Association will comply fully with all laws that relate to the conduct of its activities, including all federal law.

The Sarbanes-Oxley Act of 2002 makes it illegal for a corporate entity, including a non-profit, to punish whistleblowers who risk their careers by reporting suspected illegal activities in an organization. No form of punishment, including firing, demotion, suspension, harassment, failure to consider the employee for promotion, or any other kind of discrimination, is allowed.

**Purpose:** The Whistleblower Policy of the Association: (1) encourages directors, officers, consultants, staff, and volunteers to come forward with credible information on illegal practices or serious violations of adopted policies the Association; (2) specifies that the Association will protect the person from retaliation; and (3) identifies where such information can be reported.

### **Procedures:**

1. **Encouragement of Reporting.** The Association encourages complaints, reports, or inquiries about illegal practices or serious violations of the Association’s policies, including illegal or improper conduct by the Association itself, by its leadership, or by others on its behalf. Appropriate subjects to raise under this policy would include financial improprieties, accounting or audit matters, ethical violations, or other similar illegal or improper practices or policies. Other subjects for which the Association has existing complaint mechanisms should be addressed under those mechanisms, such as raising matters of alleged discrimination or harassment via the Association’s human resources channels, unless those channels are themselves implicated in the wrongdoing. This policy is not intended to provide a means of appeal from outcomes in those other mechanisms.
2. **Protection from Retaliation.** The Association prohibits retaliation by or on behalf of the Association against directors, officers, consultants, staff, and volunteers for making good faith complaints, reports, or inquiries under this policy or for participating in a review or investigation under this policy. This protection extends to those whose allegations are made in good faith but prove to be mistaken. The Association reserves the right to discipline persons who make bad faith, knowingly false, or vexatious complaints, reports, or inquiries or who otherwise abuse this policy.
3. **Where to Report.** Complaints, reports, or inquiries may be made under this policy on a confidential or anonymous basis. They should describe in detail the specific facts demonstrating the basis of the complaints, reports, or inquiries. They should be directed to the Association’s Executive Director; if that person is implicated in the complaint, report, or inquiry, it should be directed to the Chair of the Board of Directors. Directors, officers, consultants, staff, and volunteers must recognize that the Association may be unable to fully evaluate a vague or general complaint, report, or inquiry that is made anonymously.

4. **Investigating the Concern.** Following the receipt of any complaints submitted, the Executive Director shall notify the Chair of the Audit Committee. The Audit Committee will investigate and conduct a prompt, discreet, and objective review of each matter so reported and take corrective and disciplinary actions where appropriate.
- a. *Investigation.* The Audit Committee may enlist committee members, consultants of the Association, and/or outside legal, accounting, or other advisors, as appropriate, to conduct any investigation of complaints regarding financial reporting, accounting, internal accounting controls, auditing matters, or any other form of misconduct, dishonesty, or fraud. In conducting any investigation, the Audit Committee shall use reasonable efforts to protect the confidentiality and anonymity of the whistleblower
  - b. *Further Information.* The amount of contact between the whistleblower and the body investigating the concern will depend on the nature of the issue and the clarity of information provided. Further information may be sought from the complainant.
  - c. *Report to Whistleblower.* The whistleblower will be given the opportunity to receive follow-up on their concern within thirty days:
    - i. Acknowledging that the concern was received;
    - ii. Indicating how the matter will be dealt with;
    - iii. Giving an estimate of the time that it will take for a final response;
    - iv. Telling them whether initial inquiries have been made; and
    - v. Telling them whether further investigations will follow, and if not, why.
  - b. *Information.* Subject to legal constraints the whistleblower will receive information about the outcome of any investigations.
  - c. *Document Retention.* The Audit Committee shall retain as a part of the records of the Committee any such complaints or concerns for a period of at least seven years.