

Whistleblower Policy

Adopted April 14, 2018

The Alumni Association of the University of Virginia (the “Association”) requires directors, officers and employees to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. Employees and other representatives of the Association are expected to act with honesty and integrity at all times in fulfilling their responsibilities, including complying with applicable laws, regulations and Association policy.

Reporting Responsibility

This Whistleblower Policy is intended to encourage and enable employees and certain others to raise any serious ethical or legal concerns regarding Association activities in a manner such that the Association can address any allegations of inappropriate personal conduct. It is the responsibility of all members of the Board Managers, officers, employees, volunteers, and clients to report concerns about suspected violations of law, regulation, or internal policies that govern the Association’s operations.

No Retaliation

It is contrary to the values of the Association for anyone to retaliate against any Manager, officer, employee, volunteer, client, or other party who in good faith reports a suspected breach of ethics, violation of law or regulation, which would include complaints of illegal discrimination, suspected fraud, or violation of internal policies governing the operations of the Association. An employee, officer or Manager who retaliates against someone who has reported a violation in good faith is subject to discipline up to and including termination of employment or removal from the Board.

Reporting Procedure

The Association has an open door policy that encourages employees to share their questions, concerns, suggestions or complaints with their supervisor. Similarly for financial clients or volunteers, your designated staff point of contact will typically be in the best position to resolve most conflicts or concerns relating to matters within the scope of day to day Association operations. These lines of communication should be the first option to resolve such matters, including those human resource issues related to performance review, compensation, promotion opportunity, scope of job responsibilities, and the like.

Should a concern relate to a possible violation of law or serious breach of ethics or Association policy, and an individual is not comfortable speaking with their supervisor or other Association point of contact, or is not satisfied with their supervisor or point of contact’s response once a concern is raised, he or she is encouraged to report the concern to the independent party engaged by the Association, who will either speak to the individual or transcribe the description of the matter, if left via voicemail or other means, for appropriate follow up and resolution. Matters properly reported through the Association’s engaged independent service will be communicated simultaneously to both a member of the Board of Managers and a member of Association senior staff for follow up and resolution.

Acting in Good Faith

Anyone filing a written complaint concerning a violation or suspected violation must be acting in good faith, which includes having reasonable grounds for believing the information disclosed is true and that the information indicates a potential serious breach of conduct. Any allegations that prove not to be substantiated and which prove to have been made maliciously or knowing to be false will be viewed as a serious disciplinary and/or legal offense.

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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.

To the extent any individual reporting a suspected violation is comfortable providing the means to be contacted for confidential follow up, additional information may be sought to appropriately address and resolve the allegation and/or concerns. While anonymous concerns may be reported, many matters deserving investigation may be difficult to evaluate as to their substance or credibility absent the ability to engage in follow up communication with the reporting individual.