

ASIANetwork
WHISTLEBLOWER POLICY
(Form 990, Schedule O)

1. Purpose.

ASIANetwork requires Board Members and staff to observe high standards of business and personal ethics in the conduct of their duties and responsibilities, and all Board Members and staff to comply with all applicable laws and regulatory requirements.

2. Reporting Responsibility.

ASIANetwork seeks to have an “Open Door Policy” and encourages Board Members and staff to share their questions, concerns, suggestions, or complaints regarding the ASIANetwork and its operations with someone who can address them properly. In most cases, a Board Member or staff member should present his or her concerns to the Board Chair or Past Chair designated by the Board. The Executive Director or Past Chair is generally in the best position to address a staff member’s area of concern regarding ASIANetwork.

- If a Board Member is not comfortable speaking with the Chair of the Board or Past Chair, or is not comfortable with the response of the Chair of the Board or Past Chair’s response, or
- If a staff member is not comfortable speaking with the Executive Director or Past Chair regarding an ASIANetwork concern or if the staff member is not satisfied with the response from the Executive Director or Past Chair regarding an ASIANetwork concern, then
- The Board Member or staff member is encouraged to speak with anyone on the Board whom the Board Member or staff member is comfortable in approaching.

3. No Retaliation.

No Board Member or staff member who in good faith reports a violation of a law or regulation requirement shall suffer harassment, retaliation, or adverse employment consequence. This Whistleblower Policy is intended to encourage and enable persons to raise serious concerns within ASIANetwork prior to seeking resolution outside ASIANetwork.

4. Compliance Officer.

ASIANetwork’s Executive Director or Past Chair, working with the Board Chair or designee, will act as ASIANetwork’s Compliance Officer. The Compliance Officer is responsible for investigating and resolving all Board Members’ or staff complaints and allegations concerning ethical or legal violations. The Board Chair or designee will take on the Compliance Officer role if the complaint involves the Executive Director or designee. If the complaint involves both the Executive Director or designee, and Board Chair or designee, the Vice Chair will carry out the functions of the Compliance Officer.

5. Accounting and Auditing Matters.

The Finance Committee of the Board shall address all reported concerns or complaints regarding ASIAnetwork accounting practices, internal controls or auditing. The Compliance Officer shall immediately notify the Finance Committee of any such complaint and work with the Committee until the matter is resolved.

6. Requirement of Good Faith.

Anyone filing a complaint concerning a violation or suspected violation of the law or regulation requirements 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.

7. 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.

8. Handling of Reported Violations.

The Compliance Officer, or the person responsible for carrying out the Compliance Officer's role with respect to a reported or suspected violation, will acknowledge receipt of the reported violation or suspected violation by writing a letter (or e-mail) to the complainant within five business days. All reports will be promptly investigated and appropriate corrective action will be taken if warranted by the investigation.