



<b>Policy TITLE:</b>	<b>Whistleblower Protection</b>
<b>Policy NO.:</b>	<b>1-109</b>
<b>REVISION NO:</b>	<b>0.1</b>
<b>Program</b>	<b>Administration</b>

<b>Policy Committee Approved Date:</b>	4/21/2017
<b>TNI Board of Directors Endorsed Date:</b>	NA
<b>POL Effective Date:</b>	4/21/2017

#### I. GENERAL

The NELAC Institute (TNI) requires directors, officers, contractors, committee members and employees to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. This policy provides protection to any individual who may bring a concern over any of TNI's practices.

This policy applies to TNI members acting on behalf of TNI, including members of the TNI board, TNI committees, subcommittees, and task forces, and any person employed by TNI. TNI programs may augment this policy with additional provisions, but may not supersede any part of it.

#### II. RELATED DOCUMENTS

Policy 1-102, Ethical Conduct of TNI Members  
TNI Quality Management Plan

#### III. REPORTING RESPONSIBILITY

It is the responsibility of all directors, officers, contractors, committee members and employees to report violations or suspected violations in accordance with this Policy.

#### IV. NO RETALIATION

No TNI director, officer, contractor, committee member or member who in good faith reports a concern over TNI's practices shall suffer harassment, retaliation, or adverse employment consequence. A director, officer, contractor, committee member or member who retaliates against someone who has reported a violation in good faith is subject to discipline up to and including termination of employment, removal from office, termination of membership, or cancellation of a contract. This Whistleblower Policy is intended to encourage and TNI members and others to raise serious concerns within the organization prior to seeking resolution outside the organization.

#### IV. REPORTING VIOLATIONS

The policy suggests that directors, officers, contractors, committee members and employees share their questions, concerns, suggestions, or complaints with someone who can address them properly. A committee chair, the TNI Board Chair, or the TNI Executive Director is available to address an area of concern. However, if an individual is not comfortable speaking with any of these individuals, the individual should contact TNI's compliance officer directly.

#### V. COMPLIANCE OFFICER

TNI's compliance officer is responsible for investigating and resolving all reported complaints and allegations and, at his or her discretion, when there is activity related to this SOP, shall advise the Executive Director, the Board Chair and/or the finance committee. The compliance officer has direct access to the board and is required to report to the board at least annually on compliance activity. TNI's compliance officer is the chair of the policy committee.

#### VI. ACCOUNTING AND AUDITING MATTERS

The finance 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.

#### VII. ACTING IN GOOD FAITH

Anyone filing a complaint concerning a violation or suspected violation of TNI's policies and procedures 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.

#### VIII. 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.

#### IX. HANDLING OF REPORTED VIOLATIONS

The compliance officer will notify the sender and acknowledge receipt of the reported violation or suspected violation within 15 business days. All reports will be promptly investigated and appropriate corrective action will be taken if warranted by the investigation.

#### Policy Approved Changes

Revision No.	Effective Date	Description of Change
0	11/15/12	
0.1	4/21/17	Five Year Review – added QMP to Related Documents. Strengthened report to Board clause in section V.