

1 NSTA Whistleblower Policy

4 **General**

6 The National Science Teachers Association requires directors, officers and employees to
7 observe high standards of business and personal ethics in the conduct of their duties and
8 responsibilities. As employees and representatives of the Organization, we must practice
9 honesty and integrity in fulfilling our responsibilities and comply with all applicable laws
10 and regulations.

12 In line with this commitment, and NSTA’s commitment to open communication, this
13 policy aims to provide an avenue for directors, officers and employees to raise concerns
14 and reassurance that they will be protected from reprisals or victimization for
15 whistleblowing in good faith.

17 **Policy:**

19 The whistleblower policy is intended to cover serious concerns that could have a large
20 impact on NSTA, such as actions that:

- 22 • Are unlawful;
- 23 • Are not in line with company policy;
- 24 • May lead to incorrect financial reporting;
- 25 • Otherwise amount to serious improper conduct.

27 **Safeguards:**

29 **Acting in Good Faith**

30 Anyone filing a complaint concerning a violation or suspected violation must be acting in
31 good faith and have reasonable grounds for believing the information disclosed indicates
32 a violation of the Code. Any allegations that prove not to be substantiated and which
33 prove to have been made maliciously or knowingly to be false will be viewed as a serious
34 disciplinary offense.

36 **Confidentiality**

37 Violations or suspected violations may be submitted on a confidential basis by the
38 complainant or may be submitted anonymously. Reports of violations or suspected
39 violations will be kept confidential to the extent possible, consistent with the need to
40 conduct an adequate investigation.

42 **Anonymous Allegations**

43 The policy encourages employees to put their names to allegations because appropriate
44 follow-up questions and investigation may not be possible unless the source of the
45 information is identified. Concerns expressed anonymously will be investigated, but
46 consideration will be given to:

- The seriousness of the issue raised;
- The credibility of the concern; and
- The likelihood of confirming the allegation from attributable sources.

No director, officer or employee who in good faith reports a violation shall suffer harassment, retaliation or adverse employment consequence. 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. This Whistleblower Policy is intended to encourage and enable employees and others to raise serious concerns within the organization prior to seeking resolution outside the organization.

Procedure:

Process for raising a concern

The whistleblower procedure is intended to be used for serious and sensitive issues.

Serious concerns relating to financial reporting, unethical or illegal conduct should be reported in either of the following ways:

- Directly to the **Human Resources Director** at (703) 312-9216
- Anonymously to the **Ethics line** at (888) 255-4242
- Mailing address alternative for written documents:

NSTA Ethics line
c/o Human Resources Department
1840 Wilson Blvd
Arlington, VA 22201

Employment-related concerns should continue to be reported through your normal channels such as your supervisor, Human Resources Department, your Associate Executive Director or Executive Director.

For suspected fraud, or when you are not satisfied or uncomfortable with following the organization's policy, individuals should contact the Chair of the NSTA Audit Committee directly.

Timing

The earlier a concern is expressed, the easier it is to take action.

Initial Inquiries

Initial inquiries will be made to determine whether an investigation is appropriate, and the form that it should take. Some concerns may be resolved by agreed action without the need for investigation.

How The Complaint Will Be Handled

The action taken will depend on the nature of the concern.

1 The Chair of the NSTA Audit Committee will receive a report on each complaint and a
2 follow-up report on actions taken.

3
4 Regarding accounting and auditing matters, the Chair shall immediately notify the Audit
5 Committee of any such complaint and work with the committee until the matter is
6 resolved.

7
8 The Chair required is to report to the Audit Committee at least annually on any activity.

9
10 **Report to Complainant**

11 The complainant will be given the opportunity to receive follow-up on their concern in
12 two weeks:

- 13 • Acknowledging that the concern was received;
- 14 • Indicating how the matter will be dealt with;
- 15 • Giving an estimate of the time that it will take for a final response;
- 16 • Telling them whether initial inquiries have been made;
- 17 • Telling them whether further investigations will follow, and if not, why not.

18
19 **Further Information**

20 The amount of contact between the complainant and the body investigating the concern
21 will depend on the nature of the issue and the clarity of information provided. Further
22 information may be sought from the complainant.

23
24 **Information**

25 Subject to legal constraints the complainant will receive information about the outcome
26 of any investigations.

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