



Published on OASIS (<https://www.oasis-open.org>)

Whistleblower Policy

Description:

Providing instruction and protection for individuals who make allegations regarding potentially illegal or inappropriate conduct within OASIS

OASIS is committed to high standards of ethical, moral, and legal business conduct. OASIS is further dedicated to acting in good faith with those individuals who raise concerns regarding incorrect financial reporting, unlawful activity, or otherwise improper conduct.

This Whistleblower Policy aims to provide individuals with an avenue for raising such concerns, and to reassure such individuals that they will be protected from reprisal or victimization as a consequence of reporting the alleged wrongdoing of any officer, director, employee, or agent of OASIS.

Statement of Policy

No officer, director, employee, or agent of OASIS shall take any harmful action with the intent to retaliate against any person, including interference with employment or livelihood, for providing to a law enforcement officer any truthful information relating to the commission or possible commission of any offense. Nor will any officer, director, employee, or agent of OASIS take any harmful action with intent to retaliate against any person for reporting to an appropriate senior management or elected official of OASIS the suspected misuse, misallocation, or theft of any OASIS resources ; or suspected or fraudulent or dishonest conduct.

Safeguards

Harassment or Victimization - OASIS will not tolerate the harassment or victimization of any employee who raises concerns under this policy.

Confidentiality - OASIS will make every effort to treat a complainant's identity with an appropriate regard for confidentiality, with the understanding that the details of complaints may need to be shared with others in order to investigate such complaints properly.

Anonymous Allegations - Because a thorough investigation often depends on an ability to gather additional information, OASIS encourages complainants to put their names to allegations of wrongdoing. OASIS will explore anonymous allegations to the extent possible, but will weigh the prudence of continuing such investigations against the likelihood of confirming the alleged facts or circumstances from attributable sources.

Bad Faith Allegations - Allegations made in bad faith may result in disciplinary action.

Procedure

Process for Raising a Concern:

Reporting - OASIS intends this policy to be used for serious and sensitive issues. Such concerns, including those relating to financial reporting or unethical or illegal conduct may be reported directly to the Executive Director.

In the event that an individual's concern rises to the level that he/she reasonably believes that notice to the Executive Director will be disregarded or otherwise not fairly considered, the individual may then report violations or suspected violations either to the Chairman of the Board or an impartial director.

Employment-related concerns should continue to be reported through supervisors and the staff Insuperity liaison.

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

Evidence - Although a complainant is not expected to prove the truth of an allegation, he or she should be able to demonstrate that he or she has made a report in good faith. OASIS may not be able to fully evaluate vague or generalized complaints.

How the Report of Concern Will Be Handled:

Initial Inquiries - The Executive Director or Board Chairman will make initial inquiries in consultation with legal counsel, if necessary, to determine whether or not further investigation is necessary or appropriate.

Further Information - The Executive Director or Board Chairman may seek further information from any officer, director, employee, or agent of OASIS, and shall take all reasonable precautions to protect the identity of the complainant to the extent possible while doing so.

Reporting - The Board of Directors and the Finance and Audit Committee shall receive information on each complaint. The Board of Directors will determine an appropriate response to a report of concern, in consultation with the Executive Director and, if necessary, legal counsel. Officers, directors, employees, and agents of OASIS who may be implicated in such reports shall not participate in any deliberation of the Board of Directors related to the complaint, except to present information directly to the Board on his or her own behalf.

Dates

Approved:

Wed, 2012-05-02

Effective:

Wed, 2012-05-02
