

WHISTLEBLOWER POLICY
Masonic Medical Research Laboratory

PURPOSE: The Board of Directors of the Masonic Medical Research Laboratory (MMRL) requires, Directors, employees and volunteers to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. As Directors, employees and volunteers and representatives of the MMRL, we must practice honesty and integrity in fulfilling our responsibilities and comply with all applicable laws and regulations. If any employee reasonably believes that some policy, practice, or activity of the MMRL is in violation of the law, a written complaint must be filed by that employee with the Chief Financial Officer or the Board President.

Reporting Responsibility

It is the responsibility of all Directors, employees and volunteers to report ethics violations or suspected violations in accordance with this Whistleblower policy.

No Retaliation

No employee who in good faith reports an ethics violation shall suffer harassment, retaliation or adverse employment consequences. 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 policy is intended to encourage and enable Directors, employees and volunteers and others to raise serious concerns within the MMRL prior to seeking resolution outside the MMRL.

Reporting Violations

The MMRL has an open door policy and suggests that Directors, employees and volunteers share their questions, concerns, suggestions or complaints with someone who can address them properly. In most cases the Chief Financial Officer is in the best position to address an area of concern. However, if you are not comfortable speaking with the Chief Financial Officer, or his designee, or you are not satisfied with the response of the Chief Financial Officer, or his designee, you may contact the President of the Board of Directors. The Chief Financial Officer and the Board of Directors are required to investigate all reported violations.

The Chief Financial Officer is responsible for investigating and resolving all reported complaints and allegations concerning violations and, at his discretion, shall advise the Board of Directors.

Accounting and Auditing Matters

The Chief Financial Officer or his designee shall address all reported concerns or complaints regarding the MMRL's accounting practices, internal controls or auditing. The Chief Financial Officer shall immediately notify the Board of Directors of any such complaint and work with the Directors until the matter is resolved.

Acting in Good Faith

Anyone filing a complaint concerning a violation or suspected violation 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 seriously disciplinary offense.

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.

Handling of Reported Violations

The Chief Financial Officer or President will notify the sender and acknowledge receipt of the reported violation or suspected violation within five business days. All reports will be promptly investigated and appropriate corrective action will be taken if warranted by the investigation.

This Whistleblower Policy was initially adopted and approved by the Board of Directors on the 29th day of January 2012.

My signature below indicates my receipt and understanding of this policy. I also verify that I have been provided with an opportunity to ask questions about the policy.

Director/Employee/Volunteer Signature

Date

Print Name

Modified on September 8, 2016