

Sons of the American Revolution

[] SAR

Whistleblower Policy

General

The [] SAR Code of Organization Conduct (hereinafter referred to as the Code) requires officers, executive committee members, and committee chairmen to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. The same high standards are expected of all members and volunteers. Officers, executive committee members, committee chairmen, and committee members are representatives of the [] SAR and must practice honesty and integrity in fulfilling their responsibilities and comply with all applicable laws and regulations.

The objectives of the [] SAR Whistleblower Policy are to establish policies and procedures for:

- The submission of concerns regarding questionable accounting or audit matters by officers, committee chairmen, committee members, and other stakeholders of the [] SAR, on a confidential and anonymous basis.
- The receipt, retention, and treatment of complaints received by the [] SAR regarding accounting, internal controls, or auditing matters.
- The protection of officers, committee chairmen, committee members, and other stakeholders reporting concerns from retaliatory actions.

Reporting Responsibility

Each officer, committee chairman, committee member, and other stakeholder of the [] SAR has an obligation to report in accordance with this Whistleblower Policy (a) questionable or improper accounting or auditing matters, and (b) violations and suspected violations of the [] SAR Organization's Code (hereinafter collectively referred to as Concerns).

Authority of [] SAR Compliance Officer

The [] SAR Compliance Officer is appointed by the State President and his term will end simultaneously with the term of the State President. All reported Concerns will be forwarded to the [] SAR Compliance Officer in accordance with the procedures set forth herein. The [] SAR Compliance Officer shall be responsible for investigating, and making appropriate recommendations to the [] SAR Audit Committee and the Executive Committee. If the [] SAR Compliance Officer is the subject of the Concern, the [] SAR Audit Committee Chairman will receive the reported Concerns, and be responsible for investigating, and making appropriate recommendations to the Audit Committee and the [] SAR Executive Committee.

No Retaliation

This Whistleblower Policy is intended to encourage and enable officers, committee chairmen, committee members, and other stakeholders to raise Concerns within the [] SAR for investigation and appropriate action. With this goal in mind, no officer, committee chairman, committee member, or other stakeholder who, in good faith, reports a Concern shall be subject to retaliation. Moreover, a [] SAR member who retaliates against someone who has reported a Concern in good faith is subject to discipline consistent with the [] SAR Constitution and Bylaws.

Reporting Concerns

[redacted] SAR Members and Other Stakeholders

[redacted] SAR members and other stakeholders should submit Concerns in writing directly to the [redacted] SAR Compliance Officer, or in the case of a Concern about the Compliance Officer, to the [redacted] SAR Audit Committee Chairman. Contact information for the [redacted] SAR Compliance Officer and Audit Committee Chairman may be obtained from the [redacted] SAR website.

Acting in Good Faith

Anyone reporting a Concern must act in good faith and have reasonable grounds for believing the information disclosed indicates an improper accounting or auditing practice, or a violation of the [redacted] SAR Organization Code. The act of making allegations that prove to be unsubstantiated, and that prove to have been made maliciously, recklessly, or with the foreknowledge that the allegations are false, will be viewed as a serious disciplinary offense and may result in discipline consistent with the [redacted] SAR Constitution and Bylaws.

Handling of Reported Violations

The [redacted] SAR Compliance Officer shall address all reported Concerns. The [redacted] SAR Compliance Officer shall immediately notify the [redacted] SAR Audit Committee Chairman and State President of any such reported Concern. The [redacted] SAR Compliance Officer will notify the sender and acknowledge receipt of the Concern within five business days, if possible. It will not be possible to acknowledge receipt of anonymously submitted Concerns.

All reports will be promptly investigated by the [redacted] SAR Compliance Officer, and appropriate corrective action will be recommended to the [redacted] SAR Audit Committee Chair and the Executive Committee, if warranted by the investigation. In addition, action taken must include a conclusion and/or follow-up with the complainant for complete closure of the Concern.

The [redacted] SAR Compliance Officer, with the concurrence of the Executive Committee, has the authority to obtain resources deemed necessary to conduct a full and complete investigation of the allegations.

Confidentiality

Reports of Concerns and investigations pertaining thereto, shall be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation.

Disclosure of reports of Concerns to individuals not involved in the investigation will be viewed as a serious disciplinary offense and may result in discipline consistent with the [redacted] SAR Constitution and Bylaws.