

# Whistleblower Policy

## Policy's intent

This Whistleblower Policy is intended to encourage and enable anyone to raise serious concerns over actions taken or decisions made within Dallas Makerspace ("DMS") prior to seeking resolution outside the organization. This should allow DMS to internally address and correct inappropriate conduct and actions before going outside DMS for a resolution. This policy is not intended to discourage or prohibit anyone from reporting suspected illegal actions to law enforcement or bringing questions, concerns, suggestions or complaints to the membership.

## Who this policy applies to

DMS requires directors, officers, employees, members, and volunteers to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. As members, employees and representatives of DMS, we must practice honesty and integrity in fulfilling our responsibilities and comply with our Rules and Policies and all applicable laws and regulations. So this policy applies to all DMS directors, officers, employees, members, and volunteers.

## Reporting Responsibility

Where a serious concern over actions taken or decisions made within DMS is voiced, all directors, officers, and employees have the responsibility to report concerns about violations of DMS's Rules and Policies or suspected violations of law or regulations that govern DMS's operations.

## No Retaliation

DMS does not condone or tolerate those who break the law, defraud others, or violate DMS's internal rules. So it is contrary to the values of DMS for anyone to retaliate against those who in good faith report a suspected Rules and Policies violation, a suspected violation of law, suspected fraud, or suspected violation of any regulation governing the operations of DMS. Any employee 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 and/or termination of membership.

## Reporting Procedure

DMS has an open-door policy and suggests that any employee, member, or volunteer shares their questions, concerns, suggestions, or complaints with their supervisor or appropriate Committee Chair. Whenever possible, solutions should be reached at the lowest level of the organization. If you are not comfortable speaking with a supervisor or an appropriate Committee Chair or if you are not satisfied with their response, everyone is encouraged to speak with a Director or Officer. Supervisors, Committee Chairs, Officers, and Directors are required to report complaints or concerns about suspected Rules and Policies and legal violations in writing to DMS's Compliance Officer, who has the responsibility to investigate all reported complaints. Anyone with concerns or complaints may also submit their concerns in writing directly to their supervisor, appropriate Committee Chair, Board of Directors, or the Compliance Officer.

## President as Compliance Officer

The President will act as Compliance Officer and is responsible for ensuring that all complaints about unethical or illegal conduct are investigated and resolved. The President will advise the Board of Directors of all complaints and their resolution and will report, at least annually, to the Treasurer on compliance activity relating to accounting or alleged financial improprieties.

## Accounting and Auditing Matters

The President shall immediately notify the Finance Group of any concerns or complaints regarding corporate accounting practices, internal controls, or auditing. The President will work with the Finance Group 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 were not made in good faith, that are proven not to be substantiated, or that are proven to have been made maliciously or knowingly to be false will be viewed as a serious disciplinary offense.

## Confidentiality

Violations or suspected violations may be submitted on a confidential basis by the complainant. 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 President will notify the complainant that the report of the suspected violation has been received. All reports will be promptly investigated and appropriate corrective action will be taken, if warranted by the investigation. Any action taken must include a conclusion and follow-up with the complainant, if not anonymous, for complete closure of the complaint.