

Center for Security Policy Whistleblower Policy

General

The Center for Security Policy requires directors, officers, employees, independent contractors, and volunteers to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. As employees and representatives of the Center for Security Policy, we must practice honesty and integrity in fulfilling our responsibilities and comply with all applicable laws and regulations.

Reporting Responsibility

It is the responsibility of all directors, officers, and employees to report ethics violations or suspected violations in accordance with this Whistleblower Policy.

Retaliation

No director, officer, or employee who in good faith reports an ethics violation shall suffer harassment, retaliation, or adverse employment conditions as a 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 Center for Security Policy prior to seeking resolution outside the Center for Security Policy.

Reporting Violations

The Center for Security Policy has an open door policy and suggests that employees share their questions, concerns, suggestions, or complaints with someone who can address them properly. In most cases, the Chief Operating Officer (COO) is in the best position to address an area of concern. If, however, you are not comfortable speaking with the COO or you are not satisfied with the response given by the COO, you are encouraged to speak with the Chief Executive Officer (CEO). The COO will serve as the Center for Security Policy's Compliance Officer, who has specific and exclusive responsibility to investigate all reported violations.

Compliance Officer

The Center for Security Policy's Compliance Officer is responsible for investigating and resolving all reported complaints and allegations concerning violations and, at his/her discretion, shall advise the CEO and/or the Board of Directors (BOD). The Compliance Officer has direct access to the BOD and is required to report to the BOD at least annually on compliance activity.

Accounting and Auditing Matters

The BOD shall address all reported concerns or complaints regarding corporate accounting practices, internal controls, or auditing. The Compliance Officer shall immediately notify the BOD of any such complaint and work with the BOD 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 serious disciplinary offense. Disciplinary action to be taken will be at the discretion of the COO and may include termination of employment.

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 Compliance Officer 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.

Policy Approved by the Center for Security Policy's Board of Directors on [DATE].