

POLICY

Name:	Whistleblower Policy for Reporting Potential Financial Abuses or Illegal or Unethical Activities
Recommended By:	Audit Committee
Adopted/Revised:	March 5, 2017
Approved By:	Board of Directors
Document History:	This policy revises the document approved on August 3, 2012

In keeping with the policy of maintaining the highest standards of conduct and ethics, the Arthritis Foundation will investigate any suspected fraudulent or dishonest use or misuse of the Arthritis Foundation's resources or property by employees, board members, consultants or volunteers. The Arthritis Foundation has established a process by which employees, consultants and volunteers can report suspected fraudulent or dishonest conduct without fear of retaliation or other adverse consequences. A nationwide toll-free number has been made available to all Arthritis Foundation employees, volunteers and members of the community for such reporting when deemed necessary.

A person's concerns about possible fraudulent or dishonest use or misuse of resources or property should first be discussed with his or her immediate supervisor or, if suspected by a volunteer, to the staff member supporting the volunteer's work. If, for any reason, a person finds it difficult to report his or her concerns to a supervisor or management team member supporting the volunteer's work, the person may report the concerns directly to a member of the Senior Leadership Team or to the Chief Executive Officer. However, this mechanism is intended to provide an option if employees believe their concern has not been properly addressed or if they are uncomfortable in discussing it with their managers.

An additional mechanism of reporting is available through a nationwide toll-free number 866-229-6636 and is administered by an independent third-party. Any employee or any non-employee may report questionable activity related to financial controls, reporting, audits, accounting issues, and other forms of potential financial impropriety by calling this toll-free number. This number may also be used to report any allegations of dishonest conduct by Foundation employees or volunteers acting on behalf of the Foundation.

Callers may choose to remain anonymous by not giving their name and the investigating parties will make every effort to maintain anonymity or confidentiality in the course of the investigation. Calls received by the whistleblower operators will be summarized and forwarded as soon as possible to the Vice President of Legal Affairs, and to the Chair of the Audit Committee. In the event that the subject of the whistleblower's complaint is either of those individuals, the call will be forwarded to the Chief Operating Officer instead of the individual.

The Vice President of Legal Services or other designated individual will examine the concern and bring it to the attention of the appropriate member of the Senior Leadership Team or Executive Committee to determine a strategy for investigating the complaint. All complaints covered by the Whistleblower Policy will be reported to the Chair of the Audit Committee, who will provide direction and oversight for the investigation. The Audit Committee Chair will report on the status of all complaints to the full Audit Committee, and if appropriate, the Executive Committee and the Board of Directors on all matters deemed significant.

Making this whistleblower mechanism available to all employees, consultants and volunteers should not be construed to indicate that the organization is concerned that a problem exists. The Foundation believes it is important to have a mechanism to ensure there are never any doubts about the propriety of the Arthritis Foundation's financial management or other activities of the organization or individuals. If questions are raised, concerned individuals should have a mechanism to express their concerns. The Foundation adheres to this level of ethical standard to its employees, board members, consultants and volunteers alike. Employees or other persons making whistleblower reports in good faith shall not suffer discharge, demotion, suspension, threats or harassment or be discriminated against in any way as a consequence of making such reports.

To the extent any provision of this policy is inconsistent with any applicable federal, state or local laws, this policy shall be construed in that jurisdiction, to the minimum extent necessary, to allow compliance with applicable laws. The Foundation should not rely solely on this policy, but should refer to and abide by any applicable state and local laws governing matters covered in this policy.