

THE INNSBROOK HISTORICAL SOCIETY WHISTLEBLOWER POLICY

1. Purpose.

The Innsbrook Historical Society requires directors and officers, board members and employees to observe high standards of business and personal ethics in the conduct of their duties and responsibilities, and all directors and officers, members and employees to comply with all applicable laws and regulatory requirements. The purpose of this policy is to describe a procedure for directors and officer, members, and employees to follow when they believe these ethical, regulatory or legal intentions are not being met.

2. Reporting Responsibility.

The Innsbrook Historical Society seeks to have an “Open Door Policy” and encourages officers and directors, members, and employees alike to share their questions, concerns, suggestions, or complaints regarding the Organization and its operations with the person(s) best able to address them. In most cases, a director or officer should present his or her concern(s) to the Chairman of the Board. However, if a director or officer is uncomfortable speaking with the Chairman or is dissatisfied with the Chairman’s response, that person is encouraged to bring his or her concerns to any Board member with whom he or she is comfortable.

3. No Retaliation.

Persons who in good faith report a violation of a law or regulation requirement shall not suffer harassment, retaliation, or adverse employment 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 persons to raise serious concerns within the Organization prior to seeking resolution outside of the Organization.

4. Compliance Officer.

The Chairman of the Board will act as the Organization’s Compliance Officer. The Compliance Officer is responsible for investigating and resolving, if possible, all employee complaints, including violations of established personnel policy and practices, violations of any code of conduct or personnel handbooks or regulations which may from time-to-time be developed by the Organization, any violations of the Organization’s Conflict of Interest Policy, any violations of the terms of any grant or contractual obligation of the Organization, as well as alleged violations of state or federal law, including those pertaining to civil rights, discrimination and harassment, workplace safety, and the use or possession of alcohol, drugs, contraband, or weapons on the premises.

. If the complaint involves the Chairman of the Board, outside legal counsel, or another Board member will serve as Compliance Officer.

5. Accounting and Auditing Matters.

A Finance Committee consisting of 3 persons selected by the Board of Directors shall address all reported concerns or complaints regarding corporate accounting practices, internal controls, or auditing. The Compliance Officer shall immediately notify the Finance Committee of any complaint which alleges

misconduct or irregularities in the corporate accounting practices, internal controls, or auditing and work with the Committee until the matter is resolved.

6. Requirement of Good Faith.

All persons making or filing a complaint must be acting in good faith and have reasonable grounds for believing the information disclosed indicates a violation. Persons making allegations which are not substantiated and which are shown to be intentionally misleading, false, or malicious, will be subject to serious discipline including termination of employment.

7. Confidentiality.

Violations or suspected violations may be submitted on a confidential basis by the complaining person 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.

8. Handling of Reported Violations.

The Compliance Officer, or the person responsible for carrying out the Compliance Officer's role with respect to a reported or suspected violation, will acknowledge receipt of the reported violation or suspected violation by writing a letter (or e-mail) to the complainant within five business days. All reports will be investigated in a reasonably prompt manner and appropriate corrective action will be taken if warranted by the investigation.

Adopted by the Board of Directors this _____ day of _____, 2010.

Chairman