

New Jersey Society of Certified Public Accountants & Affiliates

Whistleblower Policy

General

The New Jersey Society of Certified Public Accountants & Affiliates (“NJCPA” or “the Society”) expect officers, trustees, other volunteer leaders, and employees to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. Employees and representatives of the organization and affiliated organizations must practice honesty and integrity in fulfilling their responsibilities and comply with all applicable laws and regulations.

The objectives of the Society’s Whistleblower Policy are to establish policies and procedures for:

- The submission of concerns regarding questionable accounting or auditing matters by employees, trustees, officers, and other volunteer leaders of the organization, on a confidential and anonymous basis.
- The submission of concerns regarding violations or suspected violations of the policies and procedures outlined in the Employee Handbook, Standards of Conduct for NJCPA Leaders and NJCPA Employee Code of Conduct by employees, trustees, officers, and other volunteer leaders of the organization, on a confidential and anonymous basis.
- The receipt, retention, and treatment of complaints received by the organization.
- The protection of trustees, volunteers and employees who report concerns from retaliatory actions.

Reporting Responsibility

Each trustee, volunteer leader, and employee of the Society 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 policies and procedures outlined in the Employee Handbook, Standards of Conduct for NJCPA Leaders and NJCPA Employee Code of Conduct (hereinafter collectively referred to as Concerns).

Authority of Audit Committee

All reported Concerns will be forwarded to the Audit Committee from the Hotline Service in accordance with the procedures set forth herein. The Audit Committee shall be responsible for investigating, and making appropriate recommendations to the Board of Trustees, with respect to all reported Concerns.

No Retaliation

This Whistleblower Policy is intended to encourage and enable trustees, volunteer leaders, and employees to raise Concerns within the Society for investigation and appropriate action. With this goal in mind, no trustee, volunteer leader, or employee who, in good faith, reports a Concern shall be subject to retaliation or, in the case of an employee, adverse employment consequences. Moreover, a volunteer leader or employee who retaliates against someone who has reported a Concern in good faith is subject to discipline up to and including dismissal from the volunteer position or termination of employment.

Reporting Concerns

Employees

Employees are encouraged to discuss their Concern with their immediate supervisor. If, after speaking with his or her supervisor, the individual continues to have reasonable grounds to believe the Concern is valid, the individual should report the Concern confidentially to the Chief Operating Officer. In addition, if the individual is uncomfortable speaking with his or her supervisor, or the supervisor is a subject of the Concern, the individual should report his or her Concern directly to the Chief Operating Officer. Concerns may also be submitted anonymously to the Hotline Service, which is created solely for this purpose and is managed and staffed by an outside company in order to maintain the anonymity of the source. Contact information is as follows: Report It Toll-Free Number 877-778-5463.

The Chief Operating Officer is required to promptly report the Concern to the Hotline Service, which has specific and exclusive responsibility to investigate all Concerns. If the Chief Operating Officer, for any reason, does not promptly forward the Concern to the Hotline Service, the reporting individual should directly report the Concern to the Hotline Service.

Trustees and Other Volunteers

Trustees and other volunteer leaders should submit Concerns to the Hotline Service. Contact information is as follows: Report It Toll-Free Number 877-778-5463.

Handling of Reported Violations

The Hotline Service will notify the Audit Committee Chair of all reported Concerns. The Chair of the Audit Committee shall immediately notify the Audit Committee, the President, the CEO & Executive Director, and Chief Operating Officer of any such report.

All reports will be promptly investigated by the Audit Committee, and appropriate corrective action will be recommended to the Board of Trustees, 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 Audit Committee has the authority to retain outside legal counsel, accountants, private investigators, or any other resource deemed necessary to conduct a full and complete investigation of the allegations.

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 policies and procedures outlined in the Employee Handbook, Standards of Conduct for NJCPA Leaders and NJCPA Employee Code of Conduct. 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.

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, up to and including termination of employment. Such conduct may also give rise to other actions, including civil lawsuits.

Questions or Clarification Related to This Policy

All questions or other clarifications of this policy and its related responsibilities should be addressed to the Chief Operating Officer.