Arthritis National Research Foundation
Whistleblower Protection Policy

Arthritis National Research Foundation (“ANRF”) requires its directors, officers and employees to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. As employees and representatives of the ANRF, we must practice honesty and integrity in fulfilling our responsibilities and comply with all applicable laws and regulations.

**Reporting Responsibility.** This Whistleblower Policy is intended to encourage and enable employees and others to raise serious concerns internally so that ANRF can address and correct inappropriate conduct and actions. It is the responsibility of employees, officers, and all board members and other volunteers to report concerns about suspected violations of ANRF’s code of ethics or suspected violations of law or regulations that govern ANRF’s operations.

**Reporting Procedure.** ANRF has an open-door policy and suggests that employees share their questions, concerns, suggestions or complaints with their supervisor. If you are not comfortable speaking with your supervisor or you are not satisfied with your supervisor’s response, you are encouraged to speak with the CEO. Supervisors and managers are required to report complaints or concerns about suspected ethical and legal violations in writing to the ANRF’s CEO or the Chair of the Board, who has the responsibility to investigate all reported complaints. Employees with concerns or complaints may also submit their concerns in writing directly to the CEO.

**Financial.** The ANRF’s Finance Director and CEO are responsible for ensuring that all complaints about suspected unethical or illegal conduct are investigated and resolved. The Finance Director will advise the CEO/or the Board of Directors of all complaints and will report at least annually to the Treasurer on compliance activity relating to accounting or alleged financial improprieties. The Finance Committee will work with the CEO or Board Chair to resolve.

**Accounting and Auditing Matters.** The ANRF’s Finance Director shall immediately notify the Treasurer and/or CEO of any concerns or complaint regarding corporate accounting practices, internal controls or auditing and work with the appropriate committee until the matter is resolved.

**Handling of Reported Violations.** The ANRF’s CEO will notify the person who submitted a complaint and acknowledge receipt of the reported violation or suspected violation. All reports will be promptly investigated, and appropriate corrective action will be taken if warranted by the investigation.
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.

Acting in Good Faith. Anyone filing a written or verbal 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.

No Retaliation. It is contrary to the values of ANRF for anyone to retaliate against any board member, officer, employee or volunteer who in good faith reports an ethics violation, or a suspected violation of law, such as a complaint of discrimination, or suspected fraud, or suspected violation of any regulation governing the operations of ANRF. 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. A volunteer who retaliates against someone who has reported a violation in good faith is subject to removal from any association with the ANRF.

Emily Boyd Stormoen, CEO
Arthritis National Research Foundation

Policy approved by the Board of Directors on March 9, 2022