



Whistleblower Policy of The Forum of Executive Women

The Forum of Executive Women (the “Organization”) requires its directors, officers, employees and volunteers to observe high standards of business and personal ethics in the conduct of their duties and responsibilities within the Organization. As representatives of the Organization, we must practice honesty and integrity in fulfilling our responsibilities and must comply with all applicable laws and regulations.

The purpose of this Whistleblower Policy is to create an ethical and open work environment, to ensure that the Organization has a governance and accountability structure that supports its mission, and to encourage and enable directors, officers, employees and volunteers of the Organization to raise serious concerns about the occurrence of illegal or unethical actions within the Organization before turning to outside parties for resolution.

Notwithstanding anything contained in this Whistleblower Policy to the contrary, this Whistleblower Policy is not an employment contract and does not modify the employment relationship between the Organization and any of its directors, officers, employees or volunteers, nor does it change the fact that all employees of the Organization are employees at will. Nothing contained in this Whistleblower Policy provides any director, officers, employee or volunteer of the Organization with any additional rights or causes of action not otherwise available under applicable law.

Reporting Responsibility

All directors, officers, employees and volunteers of the Organization have a responsibility to report any action or suspected action taken within the Organization that is illegal, unethical or violates any adopted policy of the Organization ("Violations").

Anyone reporting a Violation must act in good faith, without malice to the Organization or any individual in the Organization and have reasonable grounds for believing that the information shared in the report indicates that a Violation has occurred. A person who makes a report does not have to prove that a Violation has occurred. However, any report which the reporter has made maliciously or any report which the reporter has good reason to believe is false will be viewed as a serious disciplinary offense.

No Retaliation

No one who, in good faith, reports a Violation or who, in good faith, cooperates in the investigation of a Violation shall suffer harassment, retaliation or adverse employment consequences. Any individual within the Organization who retaliates against another individual who has reported a Violation, in good faith, or who, in good faith, has cooperated in the investigation of a Violation is subject to discipline, including termination of employment or volunteer status.

If you believe that an individual who has made a good faith report of a Violation or who has, in good faith, cooperated in the investigation of a Violation is suffering harassment, retaliation or adverse employment consequences, please contact the Executive Committee (the "Compliance Manager").

Reporting Process

All directors, officers, employees, and volunteers should address their concerns relating to a Violation to any person within the Organization who can properly address those concerns. In most cases, the direct supervisor of an employee or volunteer is the person best suited to address a concern. However, if you are not comfortable speaking with your supervisor or if you are not satisfied with your supervisor's response, you are encouraged to speak to the Compliance Manager, to the Governance Chair or to anyone in management you feel comfortable approaching.

An officer who believes that there has been an actual or probably material violation of the law, or any material breach of a duty owed to the Organization, must report the violation to a superior officer, to the Governance Chair or the Compliance Manager. However, if the person to whom he or she would normally report is implicated in a violation, the officer should report directly to the board of directors.

The Organization encourages anyone reporting a Violation to identify himself or herself when making a report in order to facilitate the investigation of the Violation. However, reports addressed to an individual within the Organization may be submitted on a confidential basis and reports may be submitted to the Compliance Manager or Governance Chair anonymously. Reports will be kept confidential, to the extent possible, consistent with the need to conduct an adequate investigation.

Compliance Manager

A supervisor, manager or board member is required to notify the Compliance Manager of every report of a Violation. The Compliance Manager will notify the sender and acknowledge receipt of a report of Violation within five business days, but only to the extent the sender's identity is disclosed or a return address is provided.

The Compliance Manager is responsible for promptly investigating all reported Violations and for causing appropriate corrective action to be taken if warranted by the investigation.

The finance committee of the board of directors is responsible for addressing all reported concerns or complaints of Violations relating to corporate accounting practices, internal controls or auditing. Therefore, the Compliance Manager must immediately notify the finance committee of any such concern or complaint. In addition, if the Compliance Manager deems it appropriate, the Compliance Manager may advise the Executive Director or the board of directors of any other reported Violations.

The Compliance Manager has direct access to communicate with the board of directors for purposes of implementing this policy and is required to report to the board of directors at least annually about whether the Compliance Manager has received any reports under this policy.

Compliance Manager:

The Forum of Executive Women Executive Committee
The Forum of Executive Women
1231 Highland Avenue
Fort Washington, PA 19034
215-628-9944

Adopted by the Board of Directors at its Meeting on October 28, 2014.