

**NATIONAL ASSOCIATION OF HEALTH UNDERWRITERS
POLICY & PROCEDURES**

POLICY TITLE:	Whistleblower Policy
CLASSIFICATION:	Executive
POLICY NUMBER:	09-01(2)-EX
DEPARTMENT COORDINATOR:	Operations
DRAFTED BY:	Jennifer Murphy
DATE SUBMITTED (INITIAL):	January 19, 2009
DATE APPROVED:	January 19, 2009
APPROVED BY:	Board of Trustees
AMENDED:	
SUNSET:	2015

PURPOSE: To protect NAHU Board of Trustees, officers, employees and other representatives who make a good faith disclosure of specific wrongful conduct. To serve as a means of reporting all serious improprieties that potentially impact the integrity and effective operations of NAHU.

POLICY:

- I. General
NAHU expects it's Board of Trustees, officers, employees and other representatives to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. As employees and representatives of NAHU, we must practice honest and integrity in fulfilling our responsibilities and comply with all applicable laws and regulations.
- II. Reporting Responsibility
It is the responsibility of all Board members, officers and employees to report wrongful conduct in accordance with this Whistleblower Policy.
- III. Wrongful Conduct
"Wrongful Conduct" is defined in this policy to include: a serious violation of NAHU policy; a violation of applicable state or federal law; or the use of NAHU property, resources or authority for personal gain or other non-organization related purpose.
This definition is not intended to be an exclusive listing of the illegal or improper activity encompassed by this policy.
- IV. No Retaliation
No Board member, officer or employee, who in good faith, reports wrongful conduct, will suffer harassment, retaliation or adverse employment consequence. Any board member, officer or employee who retaliates against anyone who has reported wrongful conduct in good faith is subject to discipline up to and including termination of employment or removal from office. This policy is intended to encourage and enable employees and other to raise serious concerns within NAHU.
- V. Reporting Wrongful Conduct
NAHU encourages its Board members, officers and employees to share their questions, concerns, suggestions or complaints with someone who can address them

properly. Any Board member, officer or employee may report wrongful conduct to the Executive Vice President/CEO or the President of the Board of Trustees. If the wrongful conduct implicates one or both of them, or if the reporting individual is not comfortable speaking with or not satisfied with response of those individuals, the issue may be reported to any member of the Board of Trustees. The Executive Vice President/CEO, President of the Board of Trustees and all members of the Board to whom a report of wrongful conduct is made are required to immediately advise the full Board of Trustees of such report.

VI. Acting in Good Faith

Anyone filing a complaint of wrongful conduct must be acting in good faith and have reasonable grounds for believing the information disclosed indicates wrongful 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.

VII. Confidentiality

Reports of wrongful conduct or suspected wrongful conduct may be submitted on a confidential basis by the complainant or may be submitted anonymously. Reports of wrongful conduct or suspected wrongful conduct will be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation.

VIII. Handling of Reported Wrongful Conduct

A representative of the Board of Trustees will notify the sender and acknowledge receipt of the reported wrongful conduct or suspected wrongful conduct within five business days, unless such report was submitted anonymously. All reports will be promptly investigated and appropriate corrective action will be taken if warranted by the investigation.

FINANCIAL IMPACT: Minimal, possible legal expenses for review by counsel.