



Whistleblower Protection Policy

of

Institute for Middle East Understanding

The Institute for Middle East Understanding (IMEU) requires 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 IMEU, 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 IMEU can address and correct inappropriate conduct and actions. It is the responsibility of all board members, officers, employees and volunteers to report suspected violations of law or regulations that govern IMEU's operations.

No Retaliation

It is contrary to the values of the IMEU for anyone to retaliate against any board member, officer, employee or volunteer who in good faith reports a suspected violation of law, such as a complaint of discrimination, or suspected fraud, or suspected violation of any regulation governing the operations of the IMEU. 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.

Reporting Procedure

The IMEU 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 Executive Director. Supervisors and managers are required to report complaints or concerns about suspected violations in writing to the IMEU's Executive Director, who has the responsibility to investigate all reported complaints. Employees with concerns or complaints may also submit their concerns in writing directly to their supervisor or the Executive Director.

Compliance Officer

The IMEU's Executive Director will serve as the Compliance Officer and is responsible for ensuring that all complaints about illegal conduct are investigated and resolved. The Executive Director will advise the Board of Directors of all complaints and their resolution and will report at least annually to the Treasurer on compliance activity relating to accounting or alleged financial improprieties.

Accounting and Auditing Matters

The IMEU's Executive Director shall immediately notify the Treasurer of any concerns or complaints regarding corporate accounting practices, internal controls or auditing and work with the Treasurer until the matter is resolved.

Acting in Good Faith

Anyone filing a written 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.

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.

Handling of Reported Violations

The IMEU's Executive Director 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.

Reporting Violations to a Government of Law Enforcement Agency

If an employee discloses information to a government or law enforcement agency where the employee has reasonable cause to believe that the information discloses: 1) a violation of a state or federal statute; 2) a violation or noncompliance with a state or federal rule or regulation; or 3) with reference to employee safety or health, unsafe working conditions or work practices in the employee's employment or place of employment, the employee is a whistleblower and the following protections are afforded to him or her:

- 1) The IMEU may not make, adopt or enforce any rule, regulation or policy preventing an employee from being a whistleblower.
- 2) The IMEU may not retaliate against an employee who is a whistleblower.
- 3) The IMEU may not retaliate against an employee for refusing to participate in an activity that would result in a violation of a state or federal statute, or a violation or noncompliance with a state or federal rule or regulation.
- 4) The IMEU may not retaliate against an employee for having exercised his or her rights as a whistleblower in any former employment.

Compliance Officer:

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Policy approved by the Board of Directors on ____January 28, 2014_____.