

WHISTLEBLOWER POLICY

Georgetown University Alumni Association

General

Georgetown University Alumni Association's ("Association") Code of Ethical Conduct ("Code") requires members of the Board of Governors ("Governors"), Senators, 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 Association, we must practice honesty and integrity in fulfilling our responsibilities and complying with all applicable laws and regulations.

Reporting Responsibility

It is the responsibility of all Governors, Senators, Officers and Employees to comply with the Code and to report violations or suspected violations in accordance with this Whistleblower Policy.

No Retaliation

No Governor, Senator, Officer, or Employee who in good faith reports a violation of the Code shall suffer harassment, retaliation, or adverse employment consequence. A Governor, Senator, Officer, or Employee who retaliates against someone who has reported a violation in good faith is subject to discipline up to and including termination of employment or removal from the Board of Governors. This Whistleblower Policy is intended to encourage and enable employees and others to raise serious concerns within the Association prior to seeking resolution outside the Association.

Reporting Violations

The Code addresses the Association's open door policy and suggests that employees share their questions, concerns, suggestions or complaints with someone who can address them properly. In most cases, the Association's Executive Director is in the best position to address an area of concern. However, if you are not comfortable speaking with the Association's Executive Director or you are not satisfied with the Executive Director's response, you are encouraged to speak with the Association's President or any member of the Association's Executive Committee. Once a violation is reported to a Governor, Senator, Officer, or Employee, that person is required to report the suspected violation of the Code of Conduct to the Association's Compliance Officer, who has specific and exclusive responsibility to investigate all reported violations. For suspected fraud, or when you are not satisfied or are uncomfortable with following the Association's open door policy, individuals should contact the Association's Compliance Officer directly.

Compliance Officer

The Association's Compliance Officer is the Association's Treasurer and is responsible for investigating and resolving all reported complaints and allegations concerning violations of the Code and, at his/her discretion, shall advise the Executive Committee and/or the Finance and Audit Committee. The Compliance Officer has direct access to the Finance and Audit Committee of the Board of Governors and is required to report to the Finance and Audit committee at least annually on compliance activity. The Association's Compliance Officer serves as the chair of the Finance and Audit Committee, or member of same as designated by the Association's President.

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Accounting and Auditing Matters

The Finance and Audit Committee of the Board of Governors shall address all reported concerns or complaints regarding corporate accounting practices, internal controls or auditing. The Compliance Officer shall immediately notify the Finance and Audit Committee of any such complaint and work with the committee until the matter is resolved.

Acting in Good Faith

Anyone filing a complaint concerning a violation or suspected violation of the Code must be acting in good faith and have reasonable grounds for believing the information disclosed indicates a violation of the Code. 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 or may be submitted anonymously. 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 Compliance Officer will notify the sender and acknowledge receipt of the alleged violation within five business days. All reports will be promptly investigated and appropriate corrective action will be taken if warranted by the investigation.