

# **BOARD OF DIRECTORS WHISTLEBLOWER POLICY**

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## **GENERAL**

The School Nutrition Association's (SNA) Standards of Business Conduct ("Standards") for the SNA Board of Directors requires members of the Board to observe high standards of business and personal ethics in the conduct of their duties. As representatives of SNA, they are expected to practice honesty and integrity in fulfilling their SNA responsibilities and to comply with all applicable laws and regulations.

## **REPORTING RESPONSIBILITY**

It is the responsibility of all directors and officers to comply with the Standards and to report violations or suspected violations in accordance with this Whistleblower Policy. Directors and officers are encouraged to report information relating violations of any law or regulation or of the Standards (including but not limited to (i) an abuse of authority, gross mismanagement, or gross waste of money; or (ii) a substantial or specific danger to public health and safety) that such director or officer in good faith has reasonable cause to believe is credible.

## **NO RETALIATION**

No director or officer who in good faith reports a violation of the Standards shall suffer harassment or retaliation. This Whistleblower Policy is intended to encourage and enable directors, officers and others to raise serious concerns within SNA prior to seeking resolution outside SNA.

## **REPORTING VIOLATIONS**

Suspected violations of the Standards should be reported to the SNA Secretary/Treasurer, who has specific and exclusive responsibility to investigate all reported violations. Violations must be submitted in writing and should include as much detail and documentation as possible to facilitate an investigation.

## **REPORTING INDIVIDUAL**

The SNA Secretary/Treasurer is responsible for investigating and resolving all reported complaints and allegations concerning violations of the Standards. At his/her discretion, the SNA Secretary/Treasurer shall advise the Executive Director and/or the Audit Committee. As chair of the Audit Committee, the SNA Secretary/Treasurer has direct access to the Audit Committee of the Board of Directors and is required to report to the Audit Committee at least annually on compliance activity.

## **ACCOUNTING AND AUDITING MATTERS**

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

## **ACTING IN GOOD FAITH**

Anyone reporting a violation or a suspected violation of the Standards must be acting in good faith and have reasonable grounds for believing the information disclosed indicates a violation. Anyone submitting allegations that prove not to be substantiated, prove to have been made maliciously, or prove to have been made with knowledge that they were false, will be regarded as having committed a serious offense.

## **CONFIDENTIALITY**

Violations or suspected violations may be submitted on a confidential basis or may be submitted anonymously to the SNA Secretary/Treasurer 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 Secretary/Treasurer will notify the sender and acknowledge receipt of the reported violation or suspected violation within five business days. All reports will be promptly investigated and appropriate corrective action will be taken if warranted by the investigation.

**APPROVED: OCTOBER 2007; REVIEWED 2010-11; REVISED APRIL 2014**  
**BOARD OF DIRECTORS**  
**SCHOOL NUTRITION ASSOCIATION**