

Whistleblower Policy

The Pulmonary Fibrosis Foundation (“the Foundation”) is committed to preventing reprisals against employees and members who report activity undertaken by other Foundation employees or members in connection with (i) the performance of official Foundation activity that may be in violation of any state or federal law or related regulation, or (ii) the Foundation’s corporate accounting practices, internal controls, or audit (collectively referred to as “Protected Disclosure”). This includes, but is not limited to the following:

- Theft
- Financial reporting that is intentionally misleading
- Improper or undocumented financial transactions
- Improper destruction of records
- Improper use of assets
- Violations of the organization’s code of ethics and conflict of interest policies
- Any other improper occurrences regarding cash, financial procedures, or reporting
- Discrimination and workplace harassment

The Foundation, and any individual associated with the Foundation, will not:

- Retaliate against an employee or member who has made a Protected Disclosure or who has refused to obey any illegal or unethical request, or otherwise harass or cause such persons to suffer adverse employment consequences; or
- Directly or indirectly use or attempt to use the official authority or influence of their position for the purpose of interfering with the right of an employee or member to make a Protected Disclosure to Foundation leadership.

Reporting Violations

The Foundation has an open door policy and suggests that employees and members share their questions, concerns, suggestions, or complaints with the President and CEO or Chief Operating Officer, who are in the best position to address these matters. However, individuals should always feel free to contact the Foundation’s Board Chair, or a member of the Executive Committee directly if they so choose. The President and CEO is required to report suspected violations to the Foundation’s Board Chair who has the responsibility to investigate all reported violations.

Accounting and Auditing Matters

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

Confidentiality

Protected Disclosures 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

All reports will be investigated promptly and appropriate corrective action will be taken if warranted by the investigation. Reports and copies of the Protected Disclosures shall be retained by the Foundation in accordance with its record retention policy.

Baseless Allegations

There are allegations made with reckless disregard for their truth or falsity. People making such allegations may be subject to disciplinary action by the Foundation, and/or legal claims by individuals accused of such conduct.

This policy was approved by the Board of the Pulmonary Fibrosis Foundation on _____.

Board Chair

Date