



Whistleblower Policy

Zonta International and the Zonta Foundation for Women (Foundation) are committed to preventing reprisals against employees and volunteer members who report activity undertaken by other employees or volunteer members acting on behalf of Zonta or the Foundation in connection with: (i) the performance of official Zonta activities that may be in violation of any state or federal law or related regulation, or (ii) the organizations' corporate accounting practices, internal controls, or audit, collectively referred to as *Protected Disclosure*.

Definition

A whistleblower as defined by this policy is an employee of Zonta or a member who reports an activity that they consider to be illegal or dishonest to one or more of the parties specified in this Policy. Whistleblower protections are provided in two important areas - confidentiality and against retaliation. The whistleblower is not responsible for investigating the activity or for determining fault or corrective measures; appropriate management officials are charged with these responsibilities.

Reporting Violations

Zonta has an open-door philosophy and suggests that employees and members share their questions, concerns, suggestions or complaints with someone who can address them properly. In most cases, an employee's supervisor or Zonta's executive director is in the best position to address an area of concern. However, individuals may contact Zonta's compliance officer directly if they so choose. Zonta's compliance officer is the chair of the Zonta International Finance and Audit Committee. Supervisors are required to report suspected violations the compliance officer, who has the responsibility to investigate all reported violations.

Compliance Officer

Zonta's compliance officer is responsible for investigating and resolving all reported complaints and allegations concerning *Protected Disclosures* and, at his or her discretion, shall advise the international president or the treasurer/secretary. In the case of a complaint against the compliance officer, the complaint shall be reported to the international president or the treasurer/secretary.

Accounting and Auditing Matters

The Finance and Audit Committee 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.

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.

No Retaliation

Zonta and any individual associated with the organization, will not:

- Retaliate against an employee or member who has made a *Protected Disclosure* or who has refused to obey an illegal or unethical request, or otherwise harass or cause such persons to suffer adverse employment consequences.
- 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 Zonta leadership.

Handling of Reported Violations

The compliance officer will promptly notify the sender and acknowledge receipt of a *Protected Disclosure*, unless the report was submitted anonymously. All reports will be investigated promptly, and appropriate corrective action will be taken if warranted by the investigation. Reports and copies of *Protected Disclosures* shall be retained by Zonta in accordance with its record retention policy.

► Finance and Audit *Manual*, Appendix E – *Retention of Documents and Gift Guidelines*

Document control:

Original Document	Date: November 2009
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Next review date	Date: September 2024

Committee Responsible	Zonta International Board
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