



WHISTLEBLOWER POLICY

Adopted by Resolution of the Governing Board of The WAC Clearinghouse

I. Purpose.

The WAC Clearinghouse (hereinafter known as the “Organization”) requires board members, committee members, employees, and volunteers including editorial board members, editors of journals and book series, and other editorial staff members to observe high standards of business and personal ethics in the conduct of their duties and responsibilities, and all directors, committee members, employees, and volunteers including editorial board members, editors of journals and book series, and other editorial staff members to comply with all applicable laws and regulatory requirements.

2. Reporting Responsibility.

The Organization seeks to have an “Open Door Policy” and encourages board members, committee members, employees, and volunteers to share their questions, concerns, suggestions, or complaints regarding the Organization and its operations with someone who can address them properly. In most cases, a board member, committee member, employee, or volunteer should present his or her concerns to the Chair of the Board or the Publisher. However, if a board member, committee member or employee, or volunteer is not comfortable speaking with the Chair of the Board or the Publisher or is not comfortable with the Chair’s or the Publisher’s response, the board member, committee member, employee, or volunteer is encouraged to speak with anyone on the Board whom they are comfortable in approaching, or to directly contact the Organization’s outside legal counsel, whose contact information can be obtained from the Chair or the Publisher.

3. No Retaliation.

No board member, committee member, employee, or volunteer who in good faith reports a violation of a law or regulation requirement shall suffer harassment, retaliation, or adverse employment consequence. 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. A publisher, associate publisher, or volunteer who retaliates against someone who has reported a violation in good faith is subject to discipline up to and including termination of their association with the Organization. This Whistleblower Policy is intended to encourage and enable persons to raise serious concerns within the Organization prior to seeking resolution outside the Organization.

4. Compliance Officer.

The Organization’s Chair or their designee will act as the Organization’s Compliance Officer. The Compliance Officer will establish a Compliance Committee, which they will chair, that consists of no more than five and no fewer than three members, inclusive of the Compliance Officer. In addition to the Compliance Officer, the members of the Compliance Committee will be drawn from the Organization’s associate publishers. The Compliance Committee is responsible for investigating and resolving all employee complaints and allegations concerning violations of the Principles and/or Code. Outside legal counsel or another board member will carry out the functions of the Compliance Officer if the complaint involves the Chair.

5. Accounting and Auditing Matters.

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

6. Requirement of Good Faith.

Anyone filing a complaint concerning a violation or suspected violation of the law or regulation requirements 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 subject to discipline up to and including termination of their association with the Organization

7. 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.

8. Handling of Reported Violations.

The Compliance Officer, or the person responsible for carrying out the Compliance Officer's role with respect to a reported or suspected violation, will acknowledge receipt of the reported violation or suspected violation by writing a letter (or e-mail) to the complainant within five business days. All reports will be promptly investigated and appropriate corrective action will be taken if warranted by the investigation.