



The Institute of Navigation
Whistleblower Policy
Approved by Council January 25, 2009

Purpose

The ION requires Council members, committee members and employees to observe high standards of business and personal ethics in the conduct of their duties and responsibilities, and all Council members, committee members and employees to comply with all applicable laws and regulatory requirements. The ION desires that violations are reported and addressed without fear of retaliation.

Reporting Responsibility

The ION seeks to have an “open door policy” and encourages Council members, committee members and employees 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 Council member or committee member should present his or her concerns to the President and/or ION Director of Operations. The Director of Operations is generally in the best position to address an employee’s area of concern. However, if a Council member is not comfortable speaking with the President or Director of Operations, or the Council member is not satisfied with their response(s) the Council member, committee member or employee is encouraged to speak with any member of the ION’s Executive Committee whom the individuals is comfortable approaching.

No Retaliation

No Council member, committee member, or employee who in good faith reports a violation of law or regulation requirement shall suffer harassment, retaliation or adverse employment consequences. 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. The Whistleblower Policy is intended to encourage and enable persons to raise serious concerns within the organization prior to seeking resolution outside of the organization.

Compliance Officer

The ION’s Director of Operations, working with the President when necessary, will act as the ION’s Compliance Officers. The Compliance Officer is responsible for investigating and resolving all employee complaints and allegations concerning violations of the principles of law or generally accepted business ethics. The President or their designee will take on the Compliance Officer role if the complaint involves the Director of Operations. If the complaint involves both the President and the Director of Operations, outside legal counsel will carry out the functions of the Compliance Officers.

Accounting and Auditing Matters

The ION's Executive Committee or Finance Chair shall address all reported concerns or complaints regarding the organization's accounting practices, internal controls or auditing. The Compliance Officer shall immediately notify the Executive Committee of any such complaint and work with the Executive Committee until the matter is resolved.

Requirements 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.

Confidentiality

Violation or suspected violations may be submitted on a confidential basis by the complainant or 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, 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.