



APPENDIX D

OLLI@UGA WHISTLEBLOWER PROTECTION POLICY^{1, 2}

Adopted by the Board of Directors March 22, 2021

Learning in Retirement, Inc, dba OLLI@UGA (hereafter OLLI@UGA) requires directors, officers and employees to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. As employees and representatives of OLLI@UGA, we must practice honesty and integrity in fulfilling our responsibilities and comply with all applicable laws and regulations.

Reporting Responsibility

This Whistleblower Policy is intended to encourage and enable employees and others to raise serious concerns internally so that OLLI@UGA can address and correct inappropriate conduct and actions. It is the responsibility of all board members, officers, employees and volunteers to report concerns about violations of OLLI@UGA's code of ethics or suspected violations of law or regulations that govern OLLI@UGA's operations.

No Retaliation

It is contrary to the values of OLLI@UGA for anyone to retaliate against any board member, officer, employee or member who in good faith reports an ethics violation, or a suspected violation of law, such as a complaint of discrimination, or suspected fraud, or suspected violation of any regulation governing the operations of OLLI@UGA. 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.

Reporting Procedures

OLLI@UGA has an open-door policy for employees and members.

Employees

Employees are encouraged to share their questions, concerns, suggestions or complaints with their supervisor. Employees who are not comfortable speaking with their supervisor or are

¹ The University System of Georgia (USG) *Business Procedures Manual* sets forth essential business procedural components for USG institutions. Section 16.6.3 *Protection against Retaliation – Whistleblower Protection* provides, in relevant part, that:

Each institution shall maintain written procedures for receiving and investigating allegations of actions that violate the USG's policy prohibiting retaliation. Violations of this policy should be reported through the administrative processes and procedures established by each institution.

(https://www.usg.edu/business_procedures_manual/section16/C2927/)

The policy and procedures set forth in Appendix D of OLLI@UGA Policies fulfills this requirement for Learning in Retirement, Inc. dba OLLI@UGA.

² Adapted from the National Council of Nonprofits *Whistleblower Protection Policy*.

not satisfied with their supervisor's response are encouraged to submit their concerns in writing to, or speak with, the Dean of the Mary Frances Early College of Education.

Members

Members are encouraged to share their questions, concerns, suggestions or complaints with the President of the Board of Directors of OLLI@UGA. The President is responsible for ensuring that all member complaints about unethical or illegal conduct are investigated and resolved. The President will advise the Board of Directors of such complaints and their resolution. The President will also report at least annually to the Treasurer and the Chair of the Finance Committee on compliance activity relating to accounting or alleged financial improprieties.

Accounting and Auditing Matters

The President of the Board of Directors of OLLI@UGA shall immediately notify the Finance Committee of any concerns or complaint regarding corporate accounting practices, internal controls or auditing and work with the committee until the matter is resolved.

Acting in Good Faith

Anyone filing a written complaint concerning a violation or suspected violation 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

Violations or suspected violations may be submitted on a confidential basis 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 President of the Board of Directors of OLLI@UGA will notify the person who submitted a complaint and acknowledge receipt of the reported violation or suspected violation. All reports will be promptly investigated, and appropriate corrective action will be taken if warranted by the investigation.