



THE NATIONAL CAMPAIGN TO PREVENT TEEN AND UNPLANNED PREGNANCY

Whistleblower Policy

The National Campaign to Prevent Teen and Unplanned Pregnancy (the “*Campaign*”) requires members of its Board of Directors, officers, and employees to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. It is the responsibility of all Campaign Board members, officers, and employees to comply with the highest ethical, legal, and financial standards and to report violations or suspected violations in accordance with this Whistleblower Policy.

The Campaign strictly prohibits harassment, retaliation, or adverse employment action against an employee who in good faith reports an ethical, legal, or financial violation. 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. Employees, Board members, and officers are encouraged to raise serious concerns within the Campaign so that steps may be taken to resolve any problems as quickly as possible. The Campaign seeks an open, collaborative environment in which employees share their questions, concerns, suggestions, or complaints with someone who can address them properly. In most cases, an employee’s immediate supervisor is in the best position to address an area of concern. However, if employees are not comfortable speaking with a supervisor or are not satisfied with a supervisor’s response, employees are encouraged to speak with the COO/CFO, CEO, or any senior staff member they are comfortable approaching. Supervisors and managers are required to report suspected ethical, legal, or financial violations to the Campaign’s Compliance Officer (see next section) who has specific and exclusive responsibility to investigate all reported violations. For suspected fraud, individuals should contact the Campaign’s Compliance Officer directly (see below).

Handling of Reported Violations. The Compliance Officer will promptly notify the sender and acknowledge receipt of the reported violation or suspected violation. All reports will be investigated promptly and appropriate corrective action will be taken if warranted after an investigation.

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 practicable, consistent with the need to conduct a thorough investigation.

[Responsible behavior.](#) [Responsible policies.](#)

Compliance Officer. The Campaign's Compliance Officer is the Chair of the Campaign's Audit Committee. The Compliance Officer is responsible for investigating and resolving all reported complaints and allegations concerning possible ethical, legal, or financial violations and, at his/her discretion, shall advise the CEO and the Campaign President. The Compliance Officer is required to report to the Audit Committee at least annually on compliance activity.

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

Acting in Good Faith. Anyone filing a complaint concerning a violation or suspected violation of the Code of Conduct must be acting in good faith and have reasonable grounds for believing that the information disclosed indicates an ethical, legal, or financial violation. Any allegations that prove to have been made maliciously or knowingly to be false will be viewed as a serious disciplinary offense and could result in termination of employment.

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