

## **Whistleblower Protection Policy**

### **NAIOP San Diego Foundation**

NAIOP San Diego Foundation requires directors, officers and employees to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. As representatives of the NAIOP San Diego Foundation, 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 representatives and others to raise serious concerns internally so that NAIOP San Diego Foundation can address and correct inappropriate conduct and actions. It is the responsibility of all board members, officers, and volunteers to report concerns about violations of NAIOP San Diego Foundation's code of ethics or suspected violations of law or regulations that govern NAIOP San Diego Foundation's operations.

### **No Retaliation**

It is contrary to the values of NAIOP San Diego Foundation for anyone to retaliate against any board member, officer, or volunteer 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 NAIOP San Diego Foundation. A representative who retaliates against someone who has reported a violation in good faith is subject to discipline up to and including termination of involvement.

### **Reporting Procedure**

NAIOP San Diego Foundation has an open door policy and suggests that employees share their questions, concerns, suggestions or complaints with a Board Member. If you are not comfortable speaking with a Board Member or you are not satisfied with the Board Member's response, you are encouraged to speak with Executive Director. Board Members are required to report complaints or concerns about suspected ethical and legal violations in writing to the NAIOP San Diego Foundation's Executive Director who has the responsibility to investigate all reported complaints. Representatives with concerns or complaints may also submit their concerns in writing directly to the Executive Director.

### **Executive Director**

The NAIOP San Diego Foundation's Executive Director is responsible for ensuring that all complaints about unethical or illegal conduct are investigated and resolved. The Executive

Director will advise the Board of Directors of all complaints and their resolution and will report at least annually to the Treasurer on compliance activity relating to accounting or alleged financial improprieties.

### **Accounting and Auditing Matters**

The NAIOP San Diego Foundations Executive Director shall immediately notify the Treasurer and Board of Directors of any concerns or complaint regarding corporate accounting practices, internal controls or auditing and work with the Board of Directors 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 NAIOP San Diego Foundation's Executive Director 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.

Karen Burges  
Executive Director  
[karen@naiopsd.org](mailto:karen@naiopsd.org)  
858-509-4110

Policy approved by the Board of Directors on 07/2013.