

## **Whistleblower Policy Diocesan Council of Marquette – SVdP**

### **General**

The Diocesan Council of Marquette – SVdP requires officers, employees, and volunteers to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. As employees and representatives of the Diocesan Council of Marquette – SVdP, we must practice honesty and integrity in fulfilling our responsibilities and comply with all applicable laws and regulations.

### **Reporting Responsibility**

It is the responsibility of all officers, employees and volunteers to report suspected violations of the law in accordance with this Whistleblower Policy.

### **No Retaliation**

No officer, employee or volunteer who in good faith reports a violation of the law shall suffer harassment, retaliation or adverse employment consequence as a result of having made the report. An employee or volunteer who retaliates against someone because that person has reported a violation in good faith is subject to discipline up to and including termination of employment or volunteer status. This Whistleblower Policy is intended to encourage and enable employees and others to raise serious concerns within the Diocesan Council of Marquette – SVdP prior to seeking resolution outside the Diocesan Council of Marquette – SVdP.

### **Reporting Violations**

The Diocesan Council of Marquette – SVdP has an open door policy and suggests that employees and volunteers share their questions, concerns, suggestions or complaints with someone who can address them properly. In most cases, an employee's or volunteer's supervisor is in the best position to address an area of concern. However, if you are not comfortable speaking with your supervisor or you are not satisfied with your supervisor's response, you are encouraged to speak with someone in the Diocesan Council of Marquette – SVdP staff office or anyone in management whom you are comfortable in approaching. Supervisors and managers are required to report suspected violations of the law to the Diocesan Council of Marquette – SVdP Compliance Officer who has specific and exclusive responsibility to investigate all reported violations. For suspected fraud, or when you are not satisfied or uncomfortable with following the Diocesan Council of Marquette – SVdP's open door policy, individuals should contact the Diocesan Council of Marquette – SVdP Compliance Officer directly.

### **Compliance Officer**

The Diocesan Council of Marquette – SVdP's Compliance Officer is responsible for investigating and resolving all reported complaints and allegations concerning violations and, at his/her discretion, shall advise Diocesan Council of Marquette – SVdP and/or the audit committee. The Compliance Officer has direct access to the audit committee of the board of directors and is required to report to the audit committee at least annually on

compliance activity. The Diocesan Council of Marquette – SVdP’s Compliance Officer is the chair of the audit committee.

**Accounting and Auditing Matters**

The audit committee of the board of directors shall address all reported concerns or complaints regarding corporate accounting practices, internal controls or auditing. The Compliance Officer shall immediately notify the audit 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 law 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 false will be viewed as a serious disciplinary offense.

**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.

**Handling of Reported Violations**

The compliance Officer will notify the sender and acknowledge receipt of the reported violation or suspected violation within five business days. All reports will be promptly investigated and appropriate corrective action will be taken if warranted by the investigation.

**Audit Compliance Officer**

Laurie A. Schmit  
Executive Director  
Diocesan Council of Marquette – SVdP  
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**Diocesan Council of Marquette – SVdP Management Staff**

Laurie A. Schmit  
Executive Director

Policy Approved by the Diocesan Council of Marquette – SVdP Board of Directors on December 14, 2009.