

# Student American Veterinary Medical Association Whistleblower Policy

Adopted August 28, 2011

The Student American Veterinary Medical Association (SAVMA) is committed to preventing reprisals against members who in good faith report activity undertaken by SAVMA members in connection with the performance of official SAVMA activity that may be in violation of state or federal law pertaining to financial wrongdoing, corporate accounting practices, internal controls, or audit matters. These are collectively referred to as "Protected Disclosure".

The SAVMA, and any individual associated with the SAVMA, will not:

- Take any retaliatory action against a member who has made a Protected Disclosure or who
  has refused to obey an illegal or unethical request, including interference with their lawful
  employment or livelihood; or
- Directly or indirectly use or attempt to use the official authority or influence of their position for the purpose of interfering with the right of an employee or member to make a Protected Disclosure to SAVMA leadership.

#### **Reporting Violations**

The SAVMA has an open door policy and suggests that members share their questions, concerns, suggestions or complaints with someone who can address them properly. In most cases, the SAVMA Advisors are in the best position to address an area of concern.

However, individuals should always feel free to contact the SAVMA's Executive Board directly, if they so choose. The SAVMA Advisors are required to report suspected violations to SAVMA's Executive Board, who have the responsibility to investigate reported violations of state or federal law pertaining to financial wrongdoing, corporate accounting practices, internal controls, or audit matters in accordance with this policy.

#### Compliance

The SAVMA's Executive Board is responsible for investigating and resolving all reported complaints and allegations concerning financial wrongdoing, corporate accounting practices, internal controls, or audit matters (Protected Disclosures), and depending on the nature of the complaint (as set forth below), shall advise the SAVMA Advisors.

#### **Accounting and Auditing Matters**

The SAVMA Executive Board shall address all reported concerns or complaints concerning financial wrongdoing, corporate accounting practices, internal controls, or auditing.

### **Confidentiality**

Protected Disclosures 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 SAVMA Advisors will promptly notify the sender and acknowledge receipt of a Protected Disclosure (unless such report was submitted anonymously). All reports will be investigated promptly and appropriate corrective action will be taken (if warranted by the investigation).

Reports and copies of Protected Disclosures shall be retained by the SAVMA in accordance with applicable record retention policies.