

## VIII. WHISTLEBLOWER

### A. POLICY

The Association of Universities for Research in Astronomy, (AURA) requires directors, officers, and employees to observe high standards of business ethics in the conduct of their duties and responsibilities. Employees and representatives of AURA must practice honesty and integrity in fulfilling their responsibilities and comply with all applicable laws and regulations. Serious violations of such business ethical standards may fall under Policy Section B, Performance Counseling and Discipline.

It is the responsibility of all directors, officers and employees to report suspected violations of such business ethical standards of conduct in accordance with this Whistleblower Policy.

### B. PROCEDURE

1. No director, officer, or employee who in good faith reports a violation of such business ethical standards of conduct shall suffer harassment, retaliation, or adverse employment consequence. Directors, officers or staff who retaliate against someone who has reported a suspected violation in good faith is subject to discipline up to and including termination of employment. This Whistleblower Policy is intended to encourage and enable employees and others to raise serious concerns within AURA prior to seeking resolution outside of AURA.
2. AURA maintains an “open door” policy and suggests that employees share their questions, concerns, suggestions or complaints with someone who can address them properly. In most cases, an employee’s supervisor is in the best position to address an area of concern. However, this policy provides an alternative reporting route to ensure complete transparency. Any employee may report possible business ethical violations to the AURA Center/Site Human Resources Manager. Supervisors and managers, including Human Resources staff, are required to report suspected violations of the AURA ethical standards to the AURA Chief of Staff who has specific and exclusive responsibility to investigate all reported violations. Under exceptional circumstances, an employee may contact the AURA Chief of Staff directly.
3. AURA’s Chief of Staff is responsible for investigating and resolving all reported complaints and allegations concerning violations of business ethical standards and, at his/her discretion, shall inform the President, Chair of the Board of Directors and together they will determine an appropriate course of action. The Chief of Staff has direct access to the Audit Committee and the Board of Directors and is required to report to the Board of Directors at least annually on compliance activity.
4. The Chief of Staff will notify the sender and acknowledge receipt of the reported suspected violation(s) within fifteen (15) business days. All

reports will be promptly investigated, and appropriate corrective action will be taken if warranted by the investigation.

5. Anyone filing a complaint concerning a suspected violation of the ethical standard of conduct must be acting in good faith and on reasonable grounds for believing the information disclosed indicates a violation of such ethical standards.

**Policy Title and Number** A-VIII Whistleblower

**Name of Policy Owner:** AURA Chief of Staff

**Policy History:** Last version February 2008

**Policy Approved By:** AURA Regulatory Compliance Policy Committee

**Date Policy Approved:** October 7, 2019

**Effective Date of Policy:** October 7, 2019

**Description of Revisions:** Replaces the term, "Compliance Officer," with the AURA Chief of Staff; the reference to Center Official having responsibility for the Human Resources function was changed to AURA Center/Site Human Resources Manager.

**Version # of Policy:** 1.1

**Next Scheduled Review Date:** October 6, 2024