

## **Policy on Reporting of Financial, Auditing or Governance Improprieties (Whistleblower)**

The Sjögren's Foundation is committed to facilitating open and honest communications relevant to its governance, finances, and compliance with all applicable laws and regulations.

It is important that the Sjögren's Foundation be apprised about unlawful or improper behavior including, but not limited to, any of the following conduct:

- theft;
- financial reporting that is intentionally misleading;
- improper or undocumented financial transactions;
- improper destruction of records;
- improper use of assets;
- violations of the Sjögren's Foundation's [conflict-of-interest policy](#); and
- any other improper occurrence regarding cash, financial procedures, or reporting.

We request the assistance of every employee who has a reasonable belief or suspicion about any improper transaction. The Sjögren's Foundation values this input, and each employee should feel free to raise issues of concern, in good faith, without fear of retaliation. Employees will not be disciplined, demoted, lose their jobs, or be retaliated against for asking questions or voicing concerns about conduct of this sort. At the same time, the Sjögren's Foundation expects all employees to take this policy seriously, to use it in good faith, and to use it when necessary and in a judicious manner. Reports that are not made in good faith, or otherwise are intended to harass or annoy an employee, may result in disciplinary action, including termination.

### **Making a Report**

We encourage any employee who has a concern regarding an action concerning the Sjögren's Foundation's governance, finances, or compliance with all applicable laws and regulations to raise the concern with a supervisor, the president, or the director, finance and administration.

If for any reason the employee does not believe these channels of communication are adequate, the concern should be reported immediately to either the chair of the board or the chair of the Finance Committee. Anonymous reports will be accepted, and all reports will be handled on a confidential basis. The contact information for the board chair and the chair of the Finance Committee appears below.

### **Mark the envelope: "TO BE OPENED BY ADDRESSEE ONLY. PERSONAL AND CONFIDENTIAL."**

The board chair or the chair of the Finance Committee will coordinate the investigation and the Sjögren's Foundation will take appropriate action as it deems justifiable by the circumstances.

This policy is to be posted in the office of the Sjögren's Foundation, included in the personnel manual, and communicated to all new staff as part of their orientation. In addition, every year, after the annual election of the board chair and after the chair of the Finance Committee has been selected, the director, finance and administration, will have the responsibility of updating the contact information for both of those individuals and then sending the policy with the updated contact information to all staff.