

	<b>LEVEL 3 FOUNDATION POLICY:</b> <b>PMIEF COO authors, approves and monitors</b>	<b>No.:</b>
		<b>Date Approved:</b>
		<b>Rev No.:</b>
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<b>POLICY TITLE:</b>	PMIEF Whistle Blower Policy	<b>Page: 1 of 1</b>
<b>RESPONSIBILITY OF:</b>	PMIEF	
<b>PREPARED BY: Diane Fromm/Marjorie Gordon</b>		<b>APPROVED BY: PMIEF Board</b>

**I. POLICY STATEMENT:**

The PMI Educational Foundation adopts the PMI Whistle Blower Policy that is part of the PMI Employee Guide dated March 2009.

**II. PURPOSE:**

The PMIEF needs to adopt appropriate business policies and policies necessary to maintain compliance with IRS 990 regulations.

**III. DESIRED RESULTS/OBJECTIVES:**

PMIEF needs compliance with IRS 990 regulations.

**IV. DEFINITIONS:**

The whistle blower policy defines employee processes and protection.

**V. POLICY DISSEMINATION:**

**Internal:** Available on the PMI Intranet

**External:** Policy will be posted on the PMIEF Web site.

**V. SUPPORTING DOCUMENTATION:** The PMI Whistle Blower Policy on the next page.

# PMI Whistle Blower Policy

## PMI Whistle Blower Policy

The Institute is committed to lawful and ethical behavior in all of its activities and requires all of its employees conduct themselves in a manner that complies with all applicable laws and policies. Set forth below is the Institute's policy with respect to reporting good faith concerns about the legality or propriety of Institute actions or plans. To ensure that the Institute complies with the Pennsylvania Whistleblower Act, 43 Pa. Stat. §1430, it has adopted this policy.

**a. Reporting Concerns:** An employee who has a good faith concern regarding the legality or propriety of any action by the Institute, including any employee or PMI member should promptly advise the Institute as set forth in this policy.

If feasible, employees are encouraged to present their complaint initially to their supervisor, or to the Human Resources Department. However, if the employee is uncomfortable with presenting the complaint in such a manner, the employee should contact the Institute's General Counsel who will review the complaint with the Chief Executive Officer. If management is unresponsive, the employee should report his or her concerns to the Chair of the Board of the Board of Director's Performance Oversight Committee (POC). Such communications can be sent to the POC Chair at [pocchair@pmi.org](mailto:pocchair@pmi.org). Reports can be made verbally or in writing, in person or anonymously. If the matter is referred to the Chair of POC, the Chair will consult with members of POC and determine the appropriate course of action, including referring the matter to the Legal Department or obtaining assistance from outside resources to complete the Investigation and final report, as stated below.

While anonymous complaints will be accepted, employees are encouraged to identify themselves in order to increase the credibility of the complaint and to facilitate follow-up investigation.

**b. Retaliation and Good Faith Complaints** The Institute will not discharge, threaten or discriminate against an employee in any manner for his or her reporting in good faith what he or she perceives to be a wrong doing, violation, of law or policy, or other unethical or illegal conduct. The Institute will impose disciplinary measures, up to and including termination, against anyone who threatens or retaliates against an employee who makes such a good faith report.

"Good faith" as used herein means a report of conduct defined herein as wrongdoing or other concern covered by this policy, which is made without malice or consideration of personal benefit, and which the person making the report has reasonable cause to believe is true.

**c. Investigation:** The Institute will investigate these reports with care. The Institute's interest in being thorough in its investigation means that it cannot promise complete confidentiality, but it will act as discretely and with such confidentiality as is reasonably practicable. The complainant shall also treat the investigation as confidential and not disclose it apart from the processes stated herein.

The action taken will, of course, be dependant on the nature of the concern. However, the Human Resources Department and Legal Department will conduct a prompt investigation jointly, while maintaining the confidentiality of the complainant. To the extent possible, the complainant will be notified in no more than two weeks if a broader investigation appears to be appropriate, if the identity of the complainant is known. Some concerns may be resolved without the need for further investigation. If a fuller investigation is deemed appropriate, it will be conducted promptly, at no cost to the employee. Outside resources may be employed

as determined by the General Counsel to ensure that there is no appearance of a conflict of interest or a lack of fair dealing.

A written report, including recommendations, will be submitted, as appropriate, to the Chief Executive Office, the Chief Operating Officer and the Chair of the Board's Performance Oversight Committee. The complainant will also be advised of the result of the investigation in a manner that is appropriate under the circumstances. Where warranted and appropriate, corrective action will be taken, including but not limited to actions stated in the Institute's Employment Guide or Institute policies.

**d. Illustrative Types of Concerns:** The following is a non-exhaustive list of the kinds of improprieties that should be reported:

- Supplying false or misleading information on the Institute's financial or other public documents including its tax return (Form 990),
- Providing false information to or withholding material information from the Institute's auditors or Board of Directors;
- Embezzlement, self-dealing, private inurement (i.e., Institute earnings inuring to the benefit of an individual) and private benefit (i.e., Institute assets being used for personal gain or benefit);
- Violations of the Institute's Conflict of Interest and Confidentiality Policy;
- Payment for services or goods that are not rendered or delivered;
- Facilitating or concealing any of the above or similar actions:
- Any wrongdoing that constitutes a violation which is not of a merely technical or minimal nature of a Federal or State statute or regulation, of a political subdivision ordinance or regulation or of a code of conduct or ethics designed to protect the interest of the public or the employer. By way of example, such conduct may include questionable accounting reports and unethical business conduct.
- Conduct that result in substantial abuse, misuse, destruction or loss of funds or resources.

The Institute reserves the right to amend and/or supplement this policy at any time.