

**TEXAS SOCIETY SONS OF THE  
AMERICAN REVOLUTION  
(TXSSAR)**

**WHISTLEBLOWER POLICY**

**GENERAL**

TXSSAR Code of Organization Conduct (hereinafter referred to as the Code) requires officers, executive committee members, committee chairmen, patriot fund trustees, and perpetual fund trustees to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. The same high standards are expected of all members and volunteers. Officers, executive committee members, committee chairmen, patriot fund trustees, perpetual fund trustees, and committee members are representatives of TXSSAR and must practice honesty and integrity in fulfilling their responsibilities and comply with all applicable laws and regulations.

The objectives of the TXSSAR Whistleblower Policy are to establish policies and procedures for:

- The submission of concerns regarding questionable accounting or audit matters by officers, committee chairmen, committee members, patriot fund trustees, perpetual fund trustees, and other stakeholders of TXSSAR, on a confidential and anonymous basis.
- The receipt, retention, and treatment of complaints received by TXSSAR regarding accounting, internal controls, or auditing matters.
- The protection of officers, committee chairmen, committee members, patriot fund trustees, perpetual fund trustees, and other stakeholders reporting concerns from retaliatory actions.

**REPORTING RESPONSIBILITY**

Each officer, committee chairman, committee member, patriot fund trustees, perpetual fund trustees, and other stakeholder of TXSSAR has an obligation to report in accordance with this Whistleblower Policy (a) questionable or improper accounting or auditing matters, and (b) violations and suspected violations of the TXSSAR Organization's Code (hereinafter collectively referred to as Concerns).

**AUTHORITY OF TXSSAR COMPLIANCE OFFICER**

The TXSSAR Compliance Officer is appointed by the State President and his term will end simultaneously with the term of the State President. All reported Concerns will be forwarded to the TXSSAR Compliance Officer in accordance with the procedures set forth herein. The TXSSAR Compliance Officer shall be responsible for investigating, and making appropriate recommendations to the TXSSAR Audit Committee and the TXSSAR Executive Committee. If the TXSSAR Compliance Officer is the subject of the Concern, the TXSSAR Audit Committee Chairman will receive the reported Concerns, and be responsible for investigating, and making appropriate recommendations to the Audit Committee and the TXSSAR Executive Committee.

**NO RETALIATION**

This Whistleblower Policy is intended to encourage and enable officers, committee chairmen, committee members, patriot fund trustees, perpetual fund trustees, and other stakeholders to raise Concerns within TXSSAR for investigation and appropriate action. With this goal in mind, no officer, committee chairman, committee member, patriot fund trustee, perpetual fund trustee, or other stakeholder who, in good faith, reports a Concern shall be subject to retaliation. Moreover, a TXSSAR member who retaliates against someone who has reported a Concern in good faith is subject to discipline consistent with the TXSSAR Constitution and Bylaws.

## **REPORTING CONCERNS**

### **TXSSAR Members and Other Stakeholders**

TXSSAR members and other stakeholders should submit Concerns in writing directly to the TXSSAR Compliance Officer, or in the case of a Concern about the Compliance Officer, to the TXSSAR Audit Committee Chairman. Contact information for the TXSSAR Compliance Officer and Audit Committee Chairman may be obtained from the TXSSAR website.

### **TXSSAR Web Based Hotline**

Concerns can be submitted to the TXSSAR Compliance Officer, or the Audit Committee Chairman in case of Concerns about the Compliance Officer, through the Web Based Hotline, which is included on the TXSSAR website. An online form has been created for reporting Concerns directly to the appropriate Officer.

### **Acting in Good Faith**

Anyone reporting a Concern must act in good faith and have reasonable grounds for believing the information disclosed indicates an improper accounting or auditing practice, or a violation of the TXSSAR Organization Code. The act of making allegations that prove to be unsubstantiated, and that prove to have been made maliciously, recklessly, or with the foreknowledge that the allegations are false, will be viewed as a serious disciplinary offense and may result in discipline consistent with TXSSAR Constitution and Bylaws.

## **HANDLING OF REPORTED VIOLATIONS**

The TXSSAR Compliance Officer shall address all reported Concerns. The TXSSAR Compliance Officer shall immediately notify the TXSSAR Audit Committee Chairman and State President of any such reported Concern. The TXSSAR Compliance Officer will notify the sender and acknowledge receipt of the Concern within five business days, if possible. It will not be possible to acknowledge receipt of anonymously submitted Concerns.

All reports will be promptly investigated by the TXSSAR Compliance Officer, and appropriate corrective action will be recommended to the TXSSAR Audit Committee Chair and the Executive Committee, if warranted by the investigation. In addition, action taken must include a conclusion and/or follow-up with the complainant for complete closure of the Concern.

The TXSSAR Compliance Officer, with the concurrence of the Executive Committee, has the authority to obtain resources deemed necessary to conduct a full and complete investigation of the allegations.

## **CONFIDENTIALITY**

Reports of Concerns and investigations pertaining thereto, shall be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation.

Disclosure of reports of Concerns to individuals not involved in the investigation will be viewed as a serious disciplinary offense and may result in discipline consistent with TXSSAR Constitution and Bylaws.