

## Whistleblower Policy

Policy Name	WEF Whistleblower Policy
Policy Category	Legal
Policy Number	2005-004
Policy Origination and Review Dates	October, 2005; July, 2009; June 2015; August, 2020; February, 2025
Requirements	Sarbanes-Oxley Act Requirements
Review Cycle	5 years
Legal Review Required	Yes

*For purposes of this WEF Whistleblower Policy:*

***WEF Participants refers to:*** WEF members, WEF staff, WEF contractors, or non-members participating in WEF Function(s).

***Whistleblowers refers to:*** Any person(s) who reports credible information on perceived fraudulent or dishonest conduct, misuse of WEF resources or property, or violations of WEF policies.

### A. General Policy Statement

The Water Environment Federation's (WEF's) Whistleblower policy is designed to:

- 1) Encourage Whistleblowers to come forward with credible information on perceived fraudulent or dishonest conduct, misuse of WEF resources or property, or violations of WEF policies;
- 2) Identify how Whistleblowers should report complaints for conduct outlined above; and
- 3) Specify that WEF will protect Whistleblowers from retaliation in connection with WEF.

WEF will investigate any complaints for conduct outlined above. Anyone found to have engaged in fraudulent or dishonest conduct, misuse of WEF resources or property, or violations of WEF policies is subject to disciplinary action by WEF up to and including civil or criminal prosecution.

## **B. Reporting Complaints**

Whistleblowers should report complaints to the Executive Director, or their designee; however, if the complaint is about the Executive Director, it should be reported to a member of the WEF Board of Trustees (Board). Complaints should be based on credible information, be specific about the nature of the complaint and who it is about, and include sufficient detail to substantiate the complaint and support an investigation. Complaints about WEF Members (*inclusive of Trustees and Volunteers*) should follow the reporting process, and utilize the forms, outlined in the WEF Member Code of Conduct. Staff should follow WEF's employment policies, provided in the Employee Policy Manual, for reporting complaints. WEF will address and take any appropriate actions for complaints submitted that are determined to be knowingly or intentionally false.

## **C. Investigations**

The Executive Director, or their designee, will document all Whistleblower complaints including the outcome of the investigations. Investigations vary as follows:

### **1. Complaints Reported about Members (*Inclusive of Trustees and Volunteers*):**

The Executive Director, or their designee, or Trustee(s) receiving complaints will forward them to the WEF Ethics Committee who will investigate complaints as outlined in the WEF Member Discipline Policy.

### **2. Complaints Reported about Staff:**

Complaints about Staff are the responsibility of the Executive Director to address, in consultation with the WEF Legal Counsel. As outlined in WEF's Employment Policy Manual, the Executive Director will investigate complaints about Staff and will notify the Board of complaints and the actions that are being taken.

### **3. Complaints Reported about WEF Participants who are not WEF Members (*Inclusive of Trustees and Volunteer*) and that are not Staff:**

Complaints about WEF Participants who are not WEF Members (*Inclusive of Trustees and Volunteers*) and who are not Staff are the responsibility of the Executive Director to address, in consultation with the WEF Legal Counsel. The Executive Director will investigate complaints and will notify the Board of complaints and the actions that are being taken.

WEF is not obligated to provide the results of an investigation to the Whistleblower.

## **D. Retaliation**

WEF will use its best efforts to protect Whistleblowers; retaliation is not permitted.

Whistleblowers who believe that they have been subject to retaliation in connection with WEF may file a written complaint with the WEF Executive Director, or the WEF Ethics Committee.

While WEF cannot guarantee confidentiality, WEF's intent is to keep a Whistleblower's identity confidential to the extent possible unless disclosure is needed for reasons including, but not limited to, the following:

- the person agrees to be identified;
- identification is necessary to allow WEF or law enforcement officials to investigate or respond effectively to the complaint;
- identification is required by law;
- the person accused is entitled to the information as a matter of legal right.