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Identity Theft Resource Center Whistle Blower Protection Policy

Introduction:

The Statement of Values and Code of Ethics adopted by Identity Theft Resource Center (ITRC) requires all staff, board members, and volunteers to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. As employees and representatives of ITRC, we must practice honesty and integrity in fulfilling our responsibilities and comply with all applicable laws and regulations. Set forth below is ITRC's policy with respect to reporting good-faith concerns about the legality or propriety of ITRC actions or plans.

Reporting of Concerns or Complaints:

It is the responsibility of all staff, board members, and volunteers to comply with ITRC's Code of Ethics and applicable law and to report violations or suspected violations in accordance with this Whistleblower Policy.

Confidentiality:

ITRC will treat all communications under this policy in a confidential manner, except to the extent necessary 1) to conduct a complete and fair investigation, or 2) for review of ITRC operations by ITRC's board, its audit committee, ITRC's independent public accountants, and ITRC's legal counsel.

Retaliation:

ITRC will not permit any negative or adverse actions to be taken against any employee or individual for making a good-faith report of a possible violation of its Code of Ethics or applicable law, even if the report is mistaken, or against any employee or individual who assists in the investigation of a reported violation. Retaliation in any form will not be tolerated. Any act of alleged retaliation should be reported immediately and will be promptly investigated. An employee who retaliates against someone who has reported a 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 ITRC prior to seeking resolution outside the organization.

How To Report Concerns or Complaints:

Employees and others may communicate suspected violations of its Code of Ethics, applicable law, or other wrongdoing or alleged retaliation by contacting ITRC's Director of Victim Services, Sheila Gordon, or Executive Director, Jay Foley. If you wish to remain anonymous, it is not necessary that you give your name or position in any notification. Whether or not you identify yourself, for a proper investigation to be conducted, please provide ITRC with as much information as you can, sufficient to do a proper investigation, including where and when the incident occurred, names and titles of the individuals

involved, and as much other detail as you can provide.

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 ITRC's financial or other public documents, including its Form 990
- Providing false information to or withholding material information from ITRC's board or auditors
- Destroying, altering, mutilating, concealing, covering up, falsifying, or making a false entry in any records that may be connected to an official proceeding, in violation of federal or state law or regulations
- Altering, destroying, or concealing a document, or attempting to do so, with the intent to impair the document's availability for use in an official proceeding or otherwise obstructing, influencing, or impeding any official proceeding, in violation of federal or state law or regulations
- Embezzling, self-dealing, private inurement (i.e., ITRC earnings inuring to the benefit of a director, officer, or senior management) and private benefit (i.e., ITRC assets being used by anyone in the organization for personal gain or benefit)
- Paying for services or goods that are not rendered or delivered
- Using remarks or actions of a sexual nature that are not welcome and are likely to be viewed as personally offensive, including sexual flirtations; unwelcome physical or verbal advances; sexual propositions; verbal abuse of a sexual nature; the display of sexually suggestive objects, cartoons, or pictures; and physical contact of a sexual or particularly personal nature.
- Using epithets, slurs, negative stereotyping, and threatening, intimidating, or hostile acts that relate to race, color, religion, gender, national origin, age, or disability
- Circulating or posting written or graphic material in the workplace that denigrates or shows hostility or aversion toward an individual or group because of race, color, religion, gender, nationality, age, or disability
- Discriminating against an employee or potential employee due to a person's race, color, religion, sex, sexual orientation, national origin, age, physical or mental impairment, or veteran status
- Violating ITRC's Statement of Values and Code of Ethics, Conflict-of-Interest Policy, Harassment Policy, or Equal Employment Opportunity Policy
- Facilitating or concealing any of the above or similar actions

Questions:

If you have any questions regarding this policy, please contact Rex Davis, Director of Operations.