



FORGING THE FUTURE

Delta Tau Delta Fraternity Guidelines for Various Activities with Reference to Conflict of Interest

Approved by the Arch Chapter on August 2006, revised September 2023

WHEREAS, it is essential to the effective operation of Delta Tau Delta Fraternity that volunteer directors, administrative officers and other employees of the Fraternity be independent and impartial in all actions involving the Fraternity, that such office not be used for private gain, and that there be complete public confidence in the integrity of the Fraternity, now, therefore,

BE IT RESOLVED that it is the policy of the Board of Directors of Delta Tau Delta Fraternity to conduct its affairs so that no director, officer, or employee shall derive private gain from his/her association with the Fraternity except as provided by explicit policies of the Fraternity.

Adopted by the Board of Directors January 16, 2004

The following policy applies to members of the Arch Chapter and all Fraternity employees. It is not possible to enumerate all situations which constitute a conflict. The fact of each situation will determine whether the interest in question is such as to bring it within the area of potential conflict. Such facts would include the amount of business involved, the extent to which those involved could influence the Fraternity's decisions with respect to the transaction, and whether the interest is of such a nature that it might affect the objectivity or the business judgment of the individual. In determining whether a conflict is involved, there is no substitute for sound judgment in each case based upon the particular facts involved.

The acronym **BITE** summarizes the general policy for Fraternity-related travel expenses. **Business Individual Travel Expenses (BITE)** may be paid personally and then reimbursed through the expense reimbursement process. Personal travel costs are defined as those that are incurred by the Arch Chapter member or Fraternity employee for himself while traveling on Fraternity business. Occasionally an Arch Chapter member or Fraternity employee may have a meal with another individual or a small group and through obligation or practicality pay for the cost of the meal. This is acceptable under the BITE policy.

Costs incurred for group travel, lodging, meals, and incidental expenses are to be paid through the Fraternity's credit card or through direct billing to the division or Central Office to be paid with Fraternity funds.

- I. **Air travel.** Air travel for Fraternity business will be booked by Arch Chapter volunteers mindful of cost and efficiency, and also respectful of volunteer's comfort and practical considerations. Volunteers will seek the lowest fare that will afford the traveler reasonable accommodation and the greatest likelihood of serving the purpose of travel (including connection times, number of stops and weather consideration). The volunteer will consult with the Fraternity's travel agency (Travel Leaders) in order to be advised of fares and travel plans available through that agency. Fares offered there will be a guide to appropriate pricing for the anticipated travel costs. If the site offers reasonable options for the volunteer, bookings will be placed through that service. Volunteers will travel at the lowest available coach fare that allows for selection of seating in advance, and absent extenuating circumstances. Volunteers will consult with the Central Office regarding fares in excess of \$750 in order to receive advice on possible alternative arrangements. Volunteers will seek to avoid last-minute bookings that may tend to affect price.

- II. **Rental cars.** Travel for Fraternity business is to be arranged through the Emerald Club program (National at airports and Enterprise off-site). The size of vehicle and options chosen should be limited to the most appropriate necessary to accomplish the business purpose for the trip. For an individual traveling by himself or with up to three other people, a mid-size/intermediate vehicle is considered appropriate. Seat belt usage is required of the driver and all passengers. Rental of 15 passenger vans for Fraternity business should be a last resort. No alcohol is to be consumed prior to or while operating a vehicle on Fraternity business. No one under the age of 21 is to rent an automobile for Fraternity business.
- III. **Hotel stays.** Hotel lodging is to be arranged at a facility that accommodates the business purpose of the trip at a reasonable price without compromising the safety needs of the traveler. Users are encouraged to employ AAA discounts, hotel discount plans, and Internet discount programs such as Priceline.com whenever possible. Movies, snack bar charges and valet parking (unless mandated by hotel) are personal expenses and will not be reimbursed. Hotel accommodations involving multiple rooms should be paid for with the corporate credit card, secured with a deposit of corporate funds or master billed to the Fraternity for payment by the national Fraternity. All contracts for major conferences are to be reviewed by the Chief Executive Officer (CEO). Karnea contracts are to be reviewed by the CEO and Fraternity's General Legal Counsel and are signed by the CEO. Any points, miles, gifts, rebates, or other benefits earned through the contractual process or event hosting of a conference are to benefit the general Fraternity - and not the individual.
- IV. **Meals.** Conference hotel meals and pre-arranged group meals are to be paid with the corporate credit card, secured with a deposit of corporate funds or master billed to the Fraternity for payment by the national Fraternity. Only individual business meals or single meals for a small group of Arch Chapter members, Fraternity employees, alumni volunteers, or undergraduate chapter leadership at one time should be paid by an individual and reimbursed through the expense reimbursement process. Except as required by contract or facility requirements, gratuity should not exceed 20%.
- V. **Fraternity travel.** Certain Fraternity employees are provided with company automobiles to allow them to perform their jobs more efficiently and economically. Mileage is tracked between business and personal use, and W-2 implications are handled accordingly. Arch Chapter members or Fraternity employees who travel to meetings and on official Fraternity business in personal vehicles and seek mileage reimbursement are allowed the then applicable IRS volunteer or employee mileage reimbursement rate. Seat belt usage is required of the driver and all passengers. No alcohol is to be consumed prior to or while operating a vehicle on Fraternity business.
- VI. **Credit Cards.** If an individual is authorized to use a personal credit card to pay for the costs of business individual travel expenses (BITE) and the credit card company has an arrangement under which an individual earns points, miles, gifts, rebates or other benefits for every dollar charged on the card, (i.e. an affinity card), the individual may retain those benefits for personal use.

Expense reimbursement requests shall be submitted as soon as practical but no later than 60 days after the expense-related event takes place.

I acknowledge that I have received, read, understand, and agree to comply with the Delta Tau Delta Fraternity Guidelines for Various Activities with Reference to Conflict of Interest.

Name (typed/written):

Date:

**Delta Tau Delta
Arch Chapter Policy
Conflict of Interest Policy**

Article I
PURPOSE

The purpose of the Conflict of Interest Policy is to protect the Fraternity's interest when it is contemplating entering into a transaction or arrangement that might benefit the private interest of an officer, Arch Chapter member, or employee of the Fraternity. This policy is intended to supplement but not replace any applicable state laws governing conflicts of interest applicable to nonprofit and charitable corporations.

Article II
POLICIES

Arch Chapter members, officers, or members of a committee with Board of Directors or Arch Chapter delegated powers as well as Fraternity employees:

- Have a duty to act in the best interest of the Fraternity and to perform their duties honestly, responsibly and in good faith;
- Should not use their position with the Fraternity for personal gain and should exercise particular care so that no detriment to the Fraternity results from conflicts between the individual's interests and those of the Fraternity
- Are to annually review this policy and disclose any known relationships/transactions as defined in this policy; and
- Have a duty to disclose if a particular situation/transaction presents itself as a conflict under this policy or if there is uncertainty if there exists a conflict as defined by this policy. Expected timeframe for such disclosures are within 30 days after the Interested Person became aware of the conflict or presumed conflict and in any event prior to a Board or committee action relating to that conflict.

Should any Arch Chapter or committee member or Fraternity employee become aware of any undisclosed conflict of interest, or any conflict of interest not fully disclosed, such person shall make full disclosure of their knowledge of the conflict of interest involved to the Arch Chapter or to the committee established by Article V below.

Conflicts of interest are inevitable, and most are not inherently improper if properly disclosed, reviewed and the conflicted individual removed from Fraternity decision-making process related to the transaction(s) and/or person(s).

An objective body of Board of Director members with the power to prescribe remedies will review potential conflicts and prescribe necessary steps to be taken by the Interested Person and the Fraternity to mitigate any risks associated with a conflict.

Article III
DEFINITIONS

1. Interested Person.

- a. Any Arch Chapter member or member of a committee with Board or Arch Chapter delegated powers, and
- b. One of the top five current highest compensated Fraternity employees who received reportable compensation of more than \$100,000 from the Fraternity or any related organizations;

2. Family Member

An Interested Person's spouse, ancestors, brothers and sisters, children, grandchildren, great grandchildren and spouses of brothers, sisters, children, grandchildren, and great grandchildren.

3. Conflict of Interest

As a general definition, a conflict of interest exists when the Interested Person in question has:

- a. The potential for personal gain or involvement (including gain or involvement of their family member);
- b. Is involved in a Fraternity decision in which the Interested Person substantially participates; that
- c. Impacts the Interested Person's ability to be objective in their work on behalf of the Fraternity.

4. Conflict of Interest Committee

The Fraternity's Board of Directors is responsible for determining the existence and extent of an Interested Person's conflict of interest and its potential impact on the Fraternity, its governance and specifically Board or Arch Chapter deliberations on associated transactions and arrangements. The responsibility for reviewing information provided in the Annual Disclosure Statement and in between statement completion cycles is delegated to the Conflict of Interest Committee.

In the absence of a specially appointed Conflict of Interest Committee, the Conflict of Interest Committee shall be the Audit Committee of the Fraternity. The president may, if he so chooses, appoints a Conflict of Interest Committee having no less than three (3), nor more than five (5), members of the Fraternity, with such appointment being approved by vote of the Arch Chapter. Such an appointed committee shall choose its own chairman. Such committee, whether specially appointed or the Audit Committee, should hereafter be referred to as the "Conflict of Interest Committee."

Article IV ANNUAL DISCLOSURES

On an annual basis a conflict of interest policy and questionnaire (Disclosure Statement) shall be distributed to all Interested Persons. All new Interested Persons are required to complete the Disclosure Statement within sixty days of their election, appointment, or employment. The CEO is responsible for collecting the completed disclosure statements and protecting the confidentiality of the information provided. Information contained within the disclosure statement is only to be revealed to those individuals and bodies charged within this policy with the responsibility of reviewing conflicts of interest and determining appropriate handling.

In addition to completing the disclosure statement, all Interested Persons will on an annual basis shall sign a statement which affirms that such person:

- a. has received a copy of the conflict of interest policy;
- b. has read and understands the policy;
- c. has agreed to comply with the policy; and
- d. understands the Fraternity is a charitable organization and that in order to maintain its federal tax exemption it must engage primarily in activities which accomplish one or more of its tax-exempt purposes.

Article V REVIEW OF CONFLICT OF INTEREST IMPACT

Review

The CEO will annually review Annual Disclosure responses by all Interested Persons to determine the possibility, existence, and impact of probable conflicts of interest. The CEO may provide a summary report to the Board of Directors of the results of the review as well as any recommendations for those Interested Persons in which the person should recuse themselves from deliberations and decisions and the reasons for these recommendations.

Should the CEO wish to further investigate any Interested Person's disclosures, the Interested Person shall make a presentation to the Conflict of Interest Committee describing all the material facts involved with the transaction, including a full disclosure of any and all benefits that the interested person may have in the transaction. The CEO may use outside experts if the CEO feels those are prudent in the conduct of its investigations.

The CEO shall investigate, if appropriate, alternatives to the proposed transaction or arrangement. After exercising due diligence, the CEO shall determine whether the Fraternity can obtain a more advantageous transaction or arrangement with reasonable efforts from a person or entity that would not give rise to a conflict of interest. If a more advantageous transaction or arrangement is not reasonably attainable under circumstances that would not give rise to a conflict of interest, the Board of Directors shall determine by a majority vote whether the transaction or arrangement is in the Fraternity's best interest and for the Fraternity's own benefit and whether it is fair and reasonable to the Fraternity. In matters involving continuing and ongoing relationships with interested persons, the CEO and Board of Directors, if it finds it practical and justifiable to do so, may make annual findings regarding long term financial relationships.

Delta Tau Delta
Arch Chapter Policy
Conflict of Interest Policy

The CEO's consideration of the merits of any associated transactions or arrangements should address the following and be included in the written report to the Board:

- Whether the proposed transaction or arrangement will promote the exempt purposes of the Fraternity;
- Whether the terms of the transaction or arrangement are fair to the Fraternity and represent a commercially reasonable bargain such as would be arrived at by unrelated parties in an arms' length transaction; and
- Whether the CEO recommends that the Board of Directors approve or reject the proposed transactions or arrangement.

Board Actions

After receipt of the CEO report and recommendations, a majority of the Board without a conflict of interest present must determine which matters Interested Persons should recuse themselves from as well as determine that any associated transaction or arrangement is in the Fraternity's best interest and for its benefit; that the terms of the transaction or arrangement are fair and reasonable to the Fraternity; and, after the exercise of due diligence, that the Fraternity cannot obtain a more advantageous transaction or arrangement with reasonable efforts under the circumstances.

An Interested Person shall not take part in or be present for any part of any Board of Directors meeting determining the impact of that particular Interested Person's conflict of interest except to provide such information as the Board may request for consideration. If necessary, the Board may appoint a disinterested person to investigate any alternatives to the proposed transactions or arrangement.

Article VI
RECORDKEEPING

The Board of Directors shall keep minutes of all of its meetings, which minutes shall include the names of the persons who disclosed or otherwise were found to have had an actual or possible conflict of interest, the nature of the potential conflict of interest, any action taken to determine whether a conflict of interest was present, and the committee's decision as to whether a conflict of interest in fact existed. Such minutes shall also include the names of persons who were present for discussions and votes relating to the transaction or arrangement, the content of the discussion, including any alternatives to the proposed transaction or arrangement, and a record of any votes taken in connection therewith.

In connection with determinations made by the Board records set forth for Board deliberation and subsequent related actions shall be contained in the minutes of the Board of Directors.



FORGING THE FUTURE

Delta Tau Delta Arch Chapter Policy Conflict of Interest Policy

Conflict of Interest Disclosure Statement

1. Name (typed/written):

2. Capacity:

board of directors
arch chapter
committee member with Board delegated
authority executive officer
staff member, specify job title
other, specify:

3. Date of Completion:

	Yes	No
1. Other than an employment relationship with Delta Tau Delta Fraternity, do you individually conduct any other business with the Fraternity? <i>Business transactions include, but are not limited to contracts of sale, lease, license, and performance of services, whether initiated during the Fraternity's tax year or ongoing from a prior year. Business transactions also include joint ventures in which either the profits or capital interest of the organization and the interested person exceeds 10%.</i>		
2. Do you have any family members conducting business with the Fraternity? Family member is defined as spouse, ancestors, brothers and sisters, children, grandchildren, great grandchildren and spouses of brothers, sisters, children, grandchildren, and great grandchildren.		
3. Do you own 35% or a company (C-corporation, S-corporation, Partnership, LLC, or other entity type) that does business with the Fraternity?		
4. Do you have family members that own 35% of a company (C-corporation, S-corporation, Partnership, LLC, or other entity type) that do business with the Fraternity?		

**Delta Tau Delta
Arch Chapter Policy
Conflict of Interest Policy**

	Yes	No
5. Do you, in combination with other “interested persons” owns 35% of a company (C-corporation, S-corporation, Partnership, LLC or other entity type) that does business with the Fraternity? <i>A list of other “interested persons” for the Fraternity is located at the end of this document.</i>		
6. Does a family member own, in combination with other “interested persons” 35% of a company (C-corporation, S-corporation, Partnership, LLC or other entity type) that does business with the Fraternity?		
7. Do you serve as an officer, director, or trustee of an entity (or a shareholder of a professional corporation) that does business with the organization?		
8. Do you have a family member that serves as an officer, director, or trustee of an entity (or a shareholder of a professional corporation) that does business with the Fraternity?		
9. Are you a key employee of an entity (or a shareholder of a professional corporation) that does business with the Fraternity? <i>For purposes of this questionnaire, a “key employee” is defined as an individual with significant influence or authority within the entity.</i>		
10. Do you have a family member that serves as a key employee of an entity (or a shareholder of a professional corporation) that does business with the Fraternity?		
11. Do you serve as a partner or member of an entity (with ownership interests in excess of 5% of that partnership or professional corporation) that does business with the Fraternity?		
12. Do you have a family member that serves as a partner or member of an entity (with an ownership entity in excess of 5% of that partnership or professional corporation) that does business with the Fraternity?		
13. Are you a board member that is compensated as an officer or other employee of a related organization?		

**Delta Tau Delta
Arch Chapter Policy
Conflict of Interest Policy**

	Yes	No
14. Did you receive total compensation or other payments exceeding \$10,000 for the year from the Fraternity or from a related organization as an independent contractor, other than reimbursement of expenses or reasonable compensation for services provided in the capacity as a member of the governing board? <i>A list of related organizations to the Fraternity is provided at the end of this statement.</i>		
15. Did a family member receive total compensation or other payments exceeding \$10,000 for the year from the Fraternity or from related organizations as an independent contractor, other than reimbursement or expenses or reasonable compensation for services provided in the capacity as a member of the governing board?		
16. Did you receive, directly or indirectly, any single payment in excess of \$10,000 (other than employee compensation) for a transaction with the Fraternity?		
17. Did a family member receive a compensation payment in excess of \$10,000 (other than employee compensation) for a transaction with the Fraternity?		
18. Are you a substantial contributor to the Fraternity? <i>In general, a person that contributed or bequeathed an aggregate amount in excess of \$5,000 before the close of the Fraternity's tax year would be a substantial contributor. The creator of a trust is also deemed a substantial contributor with respect to the trust.</i>		
19. Are you a donor of a donor-advised fund to the Fraternity? <i>A donor-advised fund is a fund that is separately identified by reference to contributions of a donor; that is owned and controlled by a sponsoring organization; and the donor or donor advisor has or reasonably expects to have advisory privileges in the distribution or investment of amounts held in the donor advised funds or accounts.</i>		
20. Do you or a family member receive benefits from the Fraternity's donor-advised funds?		

**Delta Tau Delta
Arch Chapter Policy
Conflict of Interest Policy**

	Yes	No
21. Do you or a family member have a trust, escrow or custodial arrangement with the Fraternity?		
22. Is there any reason that your loyalty to the Fraternity could be impaired?		
23. Are you or a family member part of a selection committee of the Fraternity that grants money to the Fraternity?		
24. Do you or a family member have any loans to or from the Fraternity or a related organization? <i>A list of related organizations to the Fraternity is provided at the end of this statement.</i>		
25. Do you or a family member receive grants or other assistance from the Fraternity?		
26. Are you aware of any excess benefit transactions to report? <i>An excess benefit transaction is where the Fraternity directly or indirectly provided an economic benefit where the value of the benefit exceeds the value of the consideration received by the Fraternity.</i>		

Please provide information here for any “Yes” answers to the above questions:

Interested Persons at the time of completing this disclosure are:

Arch Chapter members

Staff:

Jack Kreman

Tony Vukusich

Nick Zuniga

Tiffani Ziemann

**Delta Tau Delta
Arch Chapter Policy
Conflict of Interest Policy**

Other Related Organizations to Delta Tau Delta Fraternity at the time of completing this disclosure are:

- Delta Tau Delta National Housing Corporation

By signing below, I certify that the information I have provided above is complete and accurate and that I:

- a. have received a copy of the conflict of interest policy;
- b. have read and understand the policy;
- c. have agreed to comply with the policy; and
- d. understand the Fraternity is a charitable organization and that in order to maintain its federal tax exemption it must engage primarily in activities which accomplish one or more of its tax-exempt purposes.

If there is any material change that develops in the information contained in the foregoing statement, I will promptly inform the President or the Chair of the Conflict of Interest Committee.

Name (typed/written)

Date

DELTA TAU DELTA CODE OF ETHICS FOR ARCH CHAPTER MEMBERS

Adopted January 21, 2005

Each member of the Arch Chapter of Delta Tau Delta Fraternity shall adhere to and advocate the following principles and responsibilities:

To the best of my knowledge and ability, I pledge:

- 1) To act with honesty and integrity, avoiding actual or apparent conflicts of interest with the Fraternity, in all personal and professional relationships.
- 2) To communicate information about the Fraternity and its affairs to its constituents that is accurate, complete, objective, relevant, timely, and understandable.
- 3) To comply with the rules and regulations of federal, state, provincial, and local governments, of other private and public regulatory agencies, and of the Fraternity's host institutions, as regards my activities on behalf of the Fraternity.
- 4) To act in good faith, responsibly, with due care, competence and diligence, without misrepresenting material facts or allowing my independent judgment to be subordinated, and to take no advantage of any member of the Fraternity through manipulation, concealment, misrepresentation, or any other practice of unfair dealing.
- 5) To respect the confidentiality of information acquired in the course of my activities for the Fraternity, except when authorized or otherwise legally obligated to disclose, and to not use any such confidential information to my personal advantage or for my personal gain.
- 6) To share knowledge and maintain skills important and relevant to the Fraternity's and its constituents needs.
- 7) To proactively promote ethical behavior as a responsible partner among peers in the Fraternity's affairs at all levels.
- 8) To achieve responsible use of and control over all assets and resources of the Fraternity employed or entrusted to me, and to ensure that the Fraternity's assets are used for legitimate business purposes.
- 9) To model mature, thoughtful, and responsible behavior in the presence of undergraduate pledges and members of the Fraternity.
- 10) To be personally accountable to the Fraternity for adherence to this *Code Of Ethics*.

I adhere to and support these principles.

Name (typed/written):

Date:



DELTA TAU DELTA

Volunteer Code of Ethics

To the best of my knowledge and ability, I pledge to:

- Act with integrity in the discharge of my duties and responsibilities as an appointed or elected volunteer;
- Not take advantage, for personal or professional reasons, of the trust of the undergraduates with whom I work;
- Communicate honestly and faithfully with the Fraternity support structure;
- Comply with the applicable laws and rules of the Fraternity, university or college, federal, state and local government, in the performance of my duties;
- Not engage in conduct that would embarrass the organization or bring discredit to its name;
- Respect the confidentiality of information acquired in the course of my duties and to protect the secrets and mysteries of our rituals and ceremonies;
- Be an example to undergraduate members of the Fraternity and to model mature, thoughtful and responsible behavior in all activities; and
- Be personally accountable for adherence to this code of ethics.

Enter your initials below to acknowledge and commit to the Delta Tau Delta Volunteer Code of Ethics.

Name (typed/written):

Date:

3.3 Whistle Blower Policy

Adopted November 1, 2017

Intent To establish guidelines to report material concerns among staff, volunteers and members.

Authority Constitution VI.A.1

Definitions None

Provisions The Delta Tau Delta Fraternity expects members of the Arch Chapter, members of committees, officers and employees to observe high standards of business and personal ethics in performing their duties and responsibilities on behalf of the Fraternity. As representatives of the Fraternity, we must practice honesty and integrity in fulfilling our responsibilities and comply with applicable laws and Fraternity policies.

The Fraternity intends to adhere to all applicable laws and policies, and the underlying purpose of this policy is to further legal and ethical compliance. The support of volunteers who provide substantial services and Fraternity employees is important in achieving this goal. This policy sets forth procedures for individuals to: (1) raise questions and concerns about potential misconduct, including potential violations of the law or Fraternity policies; and (2) report potential misconduct.

A whistleblower as defined by this policy is a member of the Arch Chapter, an Arch Chapter committee, or an employee of Delta Tau Delta who reports an activity that s/he considers to be illegal or dishonest to one or more of the parties specified in this policy. The whistleblower is not responsible for investigating the activity or for determining fault or corrective measures.

Raising Questions and Reporting

How to raise questions and report potential misconduct. If an individual believes that a violation of law or Fraternity policies may have occurred, as a first step, the individual should share questions or concerns with, and report potential misconduct to, someone who can help address the issue. To do so:

- **Employees** should contact their supervisor. If an employee is not comfortable speaking with his or her supervisor or is not satisfied with the response received, the individual should contact the Chair of the Audit Committee at 10000 Allisonville Road, Fishers, IN 46038 or via email at [audit@delts.org]
- **Officers and directors** should contact the Chairman of the Fraternity, the Chief Executive Officer, or the Chair of the Audit Committee at 10000 Allisonville Road, Fishers, IN 46038 or via email at [audit@delts.org].
- **Volunteers** should contact the Chairman of the Fraternity or the Chief Executive Officer. If an individual is not comfortable speaking with the Fraternity's officers, the individual should contact the Chair of the Audit Committee at 10000 Allisonville Road, Fishers, IN 46038 or via email at [audit@delts.org].
- Financial and accounting matters. If a concern or potential misconduct relates to the Fraternity's finances, accounting or auditing practices, or internal financial controls, individuals may also contact the Chair of the Audit Committee, at 10000 Allisonville Road, Fishers, IN 46038 or via email at [audit@delts.org].
- Confidential and anonymous reporting. Individuals can also report concerns and potential misconduct confidentially and anonymously, although the

Fraternity encourages individuals to provide their names to facilitate investigation and follow-up. To make a confidential, anonymous report, individuals should write to the Chair of the Audit Committee, 10000 Allisonville Road, Fishers, IN 46038 or via email at audit@delts.org.

Protection Against Retaliation

The Fraternity is committed to maintaining an environment where individuals feel free to raise questions and concerns in good faith. The Fraternity will not tolerate retaliation in any form against an individual who raises questions or concerns about potential misconduct in good faith, or who reports potential misconduct in good faith, including any action or suspected action by or within the Fraternity that is illegal, fraudulent or in potential violation of the law or Fraternity policies. Retaliation includes actions such as intimidation, harassment, discrimination, other retaliatory behavior and, in the case of employees, adverse employment consequences. In addition, the Fraternity will not tolerate retaliation against an individual who assists in the investigation of potential misconduct. Any individual who engages in retaliation will be subject to appropriate disciplinary action, up to and including termination.

Investigating Questions and Concerns; Confidentiality

The Fraternity will investigate reports of potential misconduct, and reports of retaliation, promptly and in a manner intended to protect confidentiality, consistent with a full and fair investigation. Every effort will be made to protect the identity of individuals who report potential misconduct, unless they agree otherwise. In some instances, it may not be possible to keep an individual's identity confidential because of the demands of conducting a thorough investigation or because of legal requirements.

Administration of This Policy

The Chief Executive Officer is responsible for administering this policy under the oversight of the Audit Committee. The Chief Executive Officer will have the responsibility to communicate directly to the Audit Committee about reports of potential misconduct, including, among other things, the manner in which reports are being investigated, the status of investigations, recommended remedial actions and the disposition of reports.

A copy of this policy will be distributed to members of the Arch Chapter, members of committees of the Arch Chapter, and employees of the Fraternity annually.

Acknowledgement I have read and understand the Whistle Blower Policy:

Name (typed/written):

Date:

ACKNOWLEDGEMENT I have read, understand and will adhere to each policy contained within this packet: Conflict of Interest and each Article therein; Conflict of Interest Disclosure Statement; Arch Chapter Code of Ethics, Volunteer Code of Ethics and the Whistle Blower Policy.

Name (typed/written)

Signature:

Date:
