

PNSQC Whistle Blower Policy

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General

The Pacific Northwest Software Quality Conference requires board members, officers, volunteers, and contractors to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. As representatives of the Pacific Northwest Software Quality Conference (PNSQC), they must practice honesty and integrity in fulfilling their responsibilities and comply with all applicable laws and regulations.

Reporting Responsibility

It is the responsibility of all board members, officers, volunteers, and contractors to comply with the law and to report violations or suspected violations in accordance with this Whistle Blower Policy.

No Retaliation

This Whistle Blower Policy is intended to encourage and enable members to raise serious concerns within the Organization prior to seeking resolution outside the Organization. No member, board member, officer, volunteer, or contractor who in good faith reports a violation shall suffer harassment, retaliation or adverse consequence. If such retaliation occurs, the board shall ensure that the offending person is removed from any contract position or position of authority within the organization.

Reporting Violations

Pacific Northwest Software Quality Conference has an open door policy and suggests that members share their questions, concerns, suggestions or complaints with someone who can address them properly. In most cases the committee chairman for each of the conference committees is in the best position to address an area of concern. However, if the member is not comfortable speaking with the chairperson or is not satisfied with their response, he/she is encouraged to report the matter to a member of the board whom the member is comfortable in approaching and a board member so approached is required to report promptly to both the Compliance Officer and to the full board; preserving the complainant's anonymity to the extent possible. For suspected fraud, or when individuals are not satisfied or are uncomfortable with following the Organization's open door policy, individuals should contact the Organization's Compliance Officer directly.

Compliance Officer

The Organization's Compliance Officer is responsible for investigating and resolving all reported complaints and allegations concerning illegal or unethical conduct and, at his/her discretion, shall advise the president and/or the audit committee. The Compliance Officer

has direct access to the audit committee of the board of directors and is required to report to the audit committee at least annually on compliance activity. The Organization's Compliance Officer is the chair of the audit committee.

Accounting and Auditing Matters

The audit committee for PNSQC shall address all reported concerns or complaints regarding corporate accounting practices, internal controls or auditing. The Compliance Officer shall immediately notify the audit committee of any such complaint and work with the committee until the matter is resolved.

Acting in Good Faith

Anyone filing a complaint concerning a violation or suspected illegal or unethical conduct must be acting in good faith and have reasonable grounds for believing the information disclosed indicates a violation. Any allegations that prove not to be substantiated and which prove to have been made maliciously or knowingly to be false will be viewed as a disciplinary offense.

Internal Controls

PNSQC has established systems, standards, controls and records for accountability in authorizing, executing, and recording transactions involving assets, liabilities, and compliance with internal policies, laws, and regulations, collectively known as internal controls. No PNSQC representative will engage in any activity that circumvents PNSQC's system of internal controls. Administrative and accounting internal controls will be in place to assure that financial, operational, and other reports are accurately and reliably prepared, and fully and fairly disclose pertinent information.

Confidentiality

Violations or suspected violations may be submitted on a confidential basis by the complainant or may be submitted anonymously. Reports of violations or suspected violations will be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation.

Handling of Reported Violations

The Compliance Officer will notify the sender and acknowledge receipt of the reported violation or suspected violation within a month. All reports will be promptly investigated and appropriate corrective action will be taken if warranted by the investigation.