

WHISTLEBLOWER POLICY

READING COMPANY TECHNICAL AND HISTORICAL SOCIETY

General

The RCT&HS's Code of Ethics (Code) requires directors, officers, employees, members, and volunteers to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. As representatives of the RCT&HS, we must practice honesty and integrity in fulfilling our responsibilities and comply with all applicable laws and regulations

Reporting Responsibility

It is the responsibility of all directors, officers, employees, members, and volunteers to comply with the Code and to report violations or suspected violations in accordance with the Whistleblower Policy.

No Retaliation

No director, officer, employee, member, or volunteer who in good faith reports a violation of the Code shall suffer harassment, retaliation or adverse consequence to employment or member status. Any director, officer, employee, member, or volunteer who retaliates against someone who has reported a violation in good faith is subject to discipline up to and including termination of employment or membership and volunteer status. This Whistleblower Policy is intended to encourage and enable members, employees and volunteers to raise serious concerns within the organization prior to seeking resolution outside the organization.

Reporting Violations

RCT&HS suggests that directors, officers, employees, members, and volunteers share their questions, concerns, suggestions or complaints with someone who can address them properly. In most cases, the appropriate committee chair is in the best position to address an area of concern. However, if an individual is not comfortable speaking with the committee chair or if an individual is not satisfied with his/her response, that individual is encouraged to speak with a member of the RCT&HS board of directors or anyone in a position of responsibility with whom he/she is comfortable. Committee chairs and members of the board of directors are required to report suspected violations of the Code to the RCT&HS Compliance Officer, who has specific and exclusive responsibility to investigate all reported violations. For suspected fraud, or when an individual is not satisfied or is uncomfortable with following the RCT&HS open door policy, individuals should contact the organization's Compliance Officer directly.

Compliance Officer

The RCT&HS Compliance Officer shall be appointed in January of each calendar year by the board of directors. The name and contact information for the Compliance Officer shall be printed annually in the Crusader. The RCT&HS Compliance Officer is responsible for investigating and seeking resolution to any and all reported complaints and allegations concerning violations of the Code. The Compliance Officer shall, at his/her discretion advise the president of the board of directors of actions taken or of actions recommended to be taken by the board of directors and/or the audit committee. The Compliance Officer has direct access to the audit committee of board of directors and is required to report to the audit committee at least annually on compliance activity.

Accounting and Auditing Matters

The audit committee of the board of directors 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 and the board of directors until the matter is resolved.

Acting in Good Faith

Anyone filing a complaint concerning a violation or suspected violation of the Code must be acting in good faith and have reasonable grounds for believing the information disclosed indicates a violation of the Code. Any allegations that prove to be unsubstantiated or which prove to have been made with malicious intent or under false pretense will be viewed as a serious disciplinary offense.

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 person who sends a report to acknowledge receipt of the reported violation or suspected violation within ten business days. All reports will be promptly investigated and appropriate corrective action will be taken if warranted by the investigation.

Adopted 1/3/2012