



ADM-105: Whistleblower – 26 October 2018

Purpose

This policy governs the reporting of all serious improprieties that potentially impact the integrity and effective operation of INCOSE by the INCOSE members, directors, officers, and contractors, agents and consultants who wish to report Wrongful Conduct in accordance with this Whistleblower Policy. This Whistleblower Policy is intended to encourage and enable INCOSE members and others to raise serious concerns within INCOSE prior to seeking resolution outside INCOSE.

Applicability

INCOSE expects its members, directors, officers, employees, and contractors, agents and consultants to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. All persons acting on behalf of INCOSE must practice honesty and integrity in fulfilling their responsibilities and comply with all applicable laws and regulations.

Definition

“Wrongful Conduct” is defined in this Whistleblower Policy to include:

- A serious violation of any INCOSE policy;
- A violation of applicable national or international law;
- The use of INCOSE property, resources, or authority for personal gain; or
- The use of INCOSE property, resources, or authority for any non-INCOSE-related purpose except as provided under INCOSE policy.

This definition of Wrongful Conduct is not intended to be an exclusive listing of the illegal or improper activity encompassed by the Whistleblower Policy. Rather, the Whistleblower Policy is intended to serve as a means of reporting Wrongful Conduct.

Within this policy, INCOSE includes the organization and all persons who are current or prior INCOSE members, agents, employees, contractors, or consultants acting on behalf of the organization.

Policy Content

INCOSE encourages all persons acting on behalf of the organization to share their questions, concerns, suggestions, or complaints with someone who can address them properly. Any INCOSE member may report alleged Wrongful Conduct to the INCOSE Secretary, in a manner consistent with reporting grievances per the Grievance Policy ADM-109. If the alleged wrongful conduct involves the INCOSE Secretary, or if the submitting party is not comfortable submitting to the Secretary, then the wrongful conduct may be submitted to any member of the Board of Directors or



the Grievance Committee (who will investigate the Wrongful Conduct) or. The Secretary and all members of the Board of Directors to whom a report of alleged Wrongful Conduct is made are required to immediately advise the full Board of Directors of the report. Reports of alleged Wrongful Conduct will be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation.

Reports of alleged Wrongful Conduct may be submitted anonymously, however, the complainant foregoes all subsequent feedback described in this Whistleblower Policy .

A representative of the Grievance Committee will notify the sender and acknowledge receipt of the alleged Wrongful Conduct within five business days. All reports will be promptly investigated, and appropriate corrective action will be taken if warranted by the investigation. A representative of the Grievance Committee will provide status or resolution of the investigation within 30 days of the receipt of the report.

Consequences of non-compliance or misuse:

Anyone filing a complaint of alleged Wrongful Conduct must have reasonable grounds for believing the information disclosed indicates Wrongful Conduct. Any unsubstantiated allegations may result in an investigation of the Whistleblower for Wrongful Conduct. No person who, in good faith, reports alleged Wrongful Conduct will suffer harassment or retaliation. Any person who retaliates against anyone who has reported an alleged Wrongful Conduct in good faith is subject to discipline consistent with ADM-107, as applicable.

Related Policies

ADM-107 Disciplinary Policy

ADM-109 Grievance Policy

SUPERSEDES: ADM-105 dated 25 July 2009

APPROVED BY: INCOSE Board of Directors, Cape Town, South Africa, 26 October 2018

POLICY OWNER (RACI Responsible R): Secretary

MAINTAINED BY (RACI Accountable A): President