



## **ADM-105: Whistleblower – 29 January 2023**

### **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. 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.

### **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

### **Related Procedures, Templates, and Forms**

None

**SUPERSEDES:** ADM-105 dated 1 February 2019

**APPROVED BY:** INCOSE Board of Directors, Q1 BoD Meeting Torrance CA, 29 January 2023

**MAINTAINED BY: (RACI Responsible R):** Secretary

**POLICY OWNER: (RACI Accountable A):** President