



**ADMIRAL  
NIMITZ  
FOUNDATION**

**WHISTLEBLOWER OR INFORMANT PROTECTION POLICY**

1. All members of the Admiral Nimitz Foundation (ANF) community are encouraged to report possible fraudulent, dishonest or unethical conduct (i.e. a whistleblower). An employee should report his or her concerns to a supervisor or manager. If for any reason an employee finds it difficult to report the concern to a manager or supervisor, the employee can report it directly to the President/CEO or Chairman.

2. Reasonable care should be taken in dealing with suspected misconduct to avoid baseless allegations, premature notice to persons suspected of misconduct, disclosure of suspected misconduct to others not involved with the investigation, and/or violation of a person's rights under the law.

3. Managers or supervisors are required to report the suspected fraudulent, dishonest or unethical conduct to the President/CEO or Chairman. Additionally, managers or supervisors faced with a suspected misconduct:


- (a) Should not contact the person suspected to further investigate the matter or demand restitution;
- (b) Should not discuss the case with anyone other than the President/CEO, Chairman, the ANF legal counsel, or a duly authorized law enforcement officer; and,
- (c) Should direct all inquiries from any attorney retained by the suspected individual or from the media to the President/CEO or Chairman.

4. The ANF will use best efforts to protect whistleblowers against retaliation, as described below. It cannot guarantee confidentiality, however, and there is no such thing as an "unofficial" or "off-the-record" report. The ANF will keep the whistleblower's identity confidential, unless:

- (a) The person agrees to be identified;
- (b) Identification is necessary to allow ANF or law enforcement officials to investigate or respond effectively to the report;
- (c) Identification is required by law; or,

- (d) The person accused of policy violations is entitled to the information as a matter of legal right in disciplinary proceedings.

5. ANF employees may not retaliate against a whistle blower with the intent or effect of adversely affecting the terms and conditions of employment (including but not limited to, threats of physical harm, loss of job, punitive work assignments, or impact on salary or wages). Whistleblowers who believe that they have been retaliated against may file a written complaint with the President/CEO or Chairman. A proven complaint of retaliation shall result in a proper remedy for the person harmed and the initiation of disciplinary action, up to and including dismissal, against the retaliating person. This protection from retaliation is not intended to prohibit managers or supervisors from taking action, including disciplinary action, in the usual scope of their duties and based on valid performance-related factors.



Michael W. Hagee  
President and Chief Executive Officer  
Admiral Nimitz Foundation