

**Purpose:** To address complaints from the membership concerning governance of the Chapter that cannot be raised to the current board.

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## **Whistleblower Policy**

PMI-Los Angeles Chapter (PMI-LA) is committed to the highest standards of ethical, moral and legal business conduct. In order to ensure those standards are met, PMI-LA fosters and encourages an atmosphere in the workplace of open and honest communications. This policy establishes the process that employees and volunteer workers of PMI-Los Angeles Chapter should follow to report concerns about activities by another employee that may be contrary to the standards set forth above. Reporting of such activity is called whistleblowing and is encouraged. This policy also establishes the process for reviewing such reports.

Whistleblower reports may be submitted for any of the following types of activities:

- Activities that are not consistent with existing PMI-LA policies and/or its code of ethics and that reflect willful disregard of them
- Failure to implement, monitor and respond to financial controls in an appropriate manner
- Unlawful activity
- Activities that constitute improper conduct such as sexual harassment, favoritism, etc.
- Inappropriate relationships with vendors
- Misrepresentations of financial activity or failure to fully report activity to company officers, the Board of Directors or the Accounting Department
- Deliberate misreporting of information to PMI-LA officers, the Board of Directors, the Accounting Department, the IRS, & any other regulatory agency
- Fraud of any kind

## **Safeguards**

1. *Reprisals:* Reprisals for submitting a whistleblower report in the form of harassment or victimization for reporting concerns under this policy will not be tolerated.
2. *Confidentiality:* Every effort will be made to treat a whistleblower's identity with appropriate regard for confidentiality.
3. *Fair and timely reviews:* All whistleblower reports will be heard and evaluated fairly, objectively and in a timely manner based on documented facts and observations.
4. *Anonymous report:* This policy encourages members to put their names to allegations because appropriate follow-up questions and investigation may not be possible unless the source of the information is identified. Concerns expressed anonymously will be investigated appropriately, but consideration will be given to the seriousness of the issue

raised, the credibility of the concern, and the likelihood of being able to confirm the allegation from credible sources.

5. *Bad Faith Allegations:* Although the member is not expected to prove the absolute truth of an allegation, the whistleblower should be able to demonstrate that the report is being made in good faith and that allegations are based on a reasonable interpretation of facts and observations.

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### **The Process: Oversight Trustees**

Per PMI Global, they do not provide a mechanism by which local members can complain about the actions of their local board. Current members of PMI can raise a formal Ethics complaint about the actions of any other PMI member, local Chapter Board Member, or Global Volunteer.

Current federal tax laws state that an identified association with membership must provide a policy for reporting infractions against the governing board.

On the PMI-LA website, there is a formal complaint form which is routed to [trustees@pmi-la.org](mailto:trustees@pmi-la.org) which is received by a minimum of 2 “non-voting” members (Trustees of the Chapter) who are familiar with the chapter’s by-laws yet are not on the chapter’s Board of Directors. This form is a “members only” option where it is clearly stated that the purpose of this form is to allow any local chapter member to raise investigations into any actions/decisions of the current standing Board of Directors.

Upon receipt of any complaint, these non-voting members shall decide upon the “next course” of action. Some sample scenarios are:

- Should it be an ethical violation issue – they shall return to the requestor information on how to lodge a formal ethical complaint against the board member in question (<https://www.pmi.org/about/ethics/complaints>)
- Should it be about improper handling of chapter’s funds or misuse of member information (Chapter Resource System download, meeting registration information), the issue can be raised to the current Global support structure (Regional Mentor, Chapter Partner, Chapter Admin) for guidance and escalation to Global for investigation into allegations.
- Should it be a “Conflict of Interest” handled incorrectly, it should be reported to the existing local board excluding the BoD member(s) concerned for investigation.
- If it is of a complicated nature, please document and send it to the current Global support structure (Customer Care) for investigation into allegations.

If after review, it is determined that the whistleblower was wrong about his/her assertions but the assertion was reasonable and submitted honestly and in good faith, the investigating authority will report back to the whistleblower on the findings of the review and will explain the findings.