



## **DELTA SIGMA THETA SORORITY, INCORPORATED**

*A Service Sorority Founded in 1913*

**2021-2022**

### **WHISTLEBLOWER POLICY**

#### **STATEMENT OF COMMITMENT AND PURPOSE**

Delta Sigma Theta Sorority, Incorporated (the “Sorority”) is committed to the highest ethical, intellectual, cultural and moral standards. The Sorority endeavors, and members should exemplify, public and personal conduct that reflects the ideals and principles adopted by the Sorority, which include the Sorority’s efforts to comply with all applicable laws that govern the Sorority. The Sorority can best achieve its goals when members and sorors as well as those who aspire to become members, faithfully follow the Sorority’s governing documents, which includes reporting suspected violations of the governing documents. To facilitate the reporting process, the Sorority has established this Whistleblower Policy, which includes an acknowledgement form that shall be signed by members, sorors and prospective members.

This Whistleblower Policy is intended to encourage and enable members and sorors as well as applicants, candidates, pyramids (collectively “prospective members”) to raise concerns internally regarding unethical or unlawful practices so that the Sorority can address and correct misconduct. It is the responsibility of all members and sorors and all prospective members to report violations (or suspected violations) of the Sorority’s Code of Conduct and other governing documents. While this Policy applies to all allegations of misconduct, the Sorority understands that reports by prospective members likely would relate solely to misconduct that violates (or is believed to violate) the Membership Intake Process.

The Sorority’s Governing Documents, administrative resources and tools include, but are not limited to, the *Constitution and Bylaws*; Chapter Management Handbook; Administrative Procedures for Membership Intake, including The Members’ Agreement Regarding Membership Intake Responsibilities (Members No Hazing Contract) and the Notice to Applicant/Candidate/Pyramid Regarding Privilege and Responsibilities Statement (Applicants/Candidates No Hazing Contract); and the Code of Conduct.

#### **DEFINITION OF WHISTLEBLOWER**

A Whistleblower is a member, soror, or prospective member who reports suspected unethical or illegal activity; or activity that violates the Sorority’s governing documents.

#### **REPORTING PROCEDURES**

Allegations of suspected misconduct or violations of the Sorority’s governing documents should be made in good faith based on reasonable grounds for suspecting that an activity or particular conduct constitutes a violation of the governing documents.

Reports of violations should be made in writing so as to assure a clear description of the issues; however, reports may be made orally when the urgency of a matter does not allow one to make a report in writing. Oral reports shall be audio-recorded to ensure clarity of the reported actions. Prior to beginning the recording, the person receiving the report (“receiving individual”) shall seek the permission of the person making the report (“reporting Individual”) to audio-record the report. Upon receiving consent to record, the receiving individual shall repeat the consent question and answer immediately before beginning the recording.

All allegations of misconduct or suspected misconduct should be factual rather than speculative or conclusory and, whether written or oral, should contain sufficiently detailed information to aid the Sorority in conducting a thorough and complete investigation. “Detailed information” includes, but is not limited to: information about: where and when the incident or activities occurred; a description of the activities or misconduct; the names

and titles of the individuals who allegedly participated in the misconduct; the names, title (if appropriate) and contact information (if available) of any person who witnessed or has knowledge of the alleged misconduct; the name of the chapter involved; and any other pertinent information. The reporting individuals should refrain from 1) obtaining evidence that they do not have right to access and 2) conducting their own investigation.

Reports shall be made to the appropriate Sorority officials, in the following order: the chapter president; the chapter advisors; the regional director and regional representative; and/or the National First Vice President **and** the Executive Director of the Sorority. If the reporting individual is not comfortable reporting to any of the foregoing individuals or is not satisfied with their response, the reporting individual should immediately escalate the reporting to the next level. **Anyone making a report pursuant to this policy always has the option of contacting the National First Vice President and/or the Executive Director directly.** Authorized persons will conduct a prompt, discreet, and objective investigation.

### **NO RETALIATION**

It is contrary to the values of the Sorority and its Code of Conduct for anyone to retaliate against anyone who in good faith reports an ethics violation, a suspected violation of law, or a suspected violation of the Sorority's governing documents. Anyone who retaliates against anyone who has reported a violation in good faith shall be subject to discipline, as appropriate pursuant to the Sorority's Code of Conduct, up to and including expulsion from the Sorority if the retaliation was by a member or soror, or preclusion from membership, if the retaliation was by an applicant or candidate. Where it appears that retaliation violated a federal or state law, the Sorority will refer the matter to the appropriate investigatory agency.

### **REPORTS MADE IN BAD FAITH**

The Sorority reserves the right to discipline members, sorors and prospective members who make bad faith, malicious, knowingly false, or frivolous allegations and complaints and/or who otherwise abuse this policy. Anyone making a complaint concerning a violation or suspected violation must be acting in good faith and have reasonable grounds for believing the reported conduct constitutes a violation of the Sorority's governing documents.

With respect to misconduct in the Membership Intake Process, the Sorority reserves the right to reduce or expunge any sanctions imposed on applicants, candidates, pyramids, members, or sorors who knowingly participate in acts that violate the Membership Intake process, but who made good faith efforts to report such violations to the appropriate officials.

### **CONFIDENTIALITY**

Violations or suspected violations may be reported under this policy on an anonymous basis. **Although the Sorority will receive and act promptly upon anonymous reports of violations, anonymous reports may preclude Sorority officials from conducting a thorough investigation of the allegations.** Reports of violations or suspected violations will be kept confidential to the extent possible. The Sorority's efforts to maintain confidentiality shall include calibrated disclosure, meaning the Sorority will exert maximum efforts to protect the identity of the reporting individual and shall make other disclosures only as necessary for it to conduct a thorough investigation.

# DELTA SIGMA THETA SORORITY, INC.

A Service Sorority Δ Grand Chapter

## WHISTLEBLOWER POLICY

### MEMBERS AND PROSPECTIVE MEMBERS ACKNOWLEDGMENT FORM

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If any member, soror, or applicant, candidate, pyramid (collectively “prospective members”) of Delta Sigma Theta Sorority, Inc. (the “Sorority”) reasonably believes that any member, soror, or prospective member is engaging in activities or conduct that violates the Sorority’s governing documents including, but not limited to, the *Constitution and Bylaws*, Chapter Management Handbook, Administrative Procedures for Membership Intake, Members’ Agreement Regarding Membership Intake Responsibilities (No Hazing Contract), Notice to Applicant/Candidate/Pyramid Regarding Privilege and Responsibilities; and the Code of Conduct, or that violates a federal, state, or international law, the member or prospective member shall report the suspected conduct or activity to the Sorority, according to the terms and procedures of the Sorority’s Whistleblower Policy, which is published on the Sorority’s website and is attached to this acknowledgement form.

As stated in the Whistleblower Policy, the Sorority shall impose discipline on anyone who retaliates against anyone who reports suspected misconduct.