

# **Whistleblower Protection Policy**

The Home Improvement Research Institute requires directors, officers, and members to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. HIRI's management firm employees are also held to the same code of conduct and confidentiality. As representatives of The Home Improvement Research Institute, we must practice honesty and integrity in fulfilling our responsibilities and comply with all applicable laws and regulations.

#### **Reporting Responsibility**

This Whistleblower Policy is intended to encourage and enable members and others to raise serious concerns internally so that The Home Improvement Research Institute can address and correct inappropriate conduct and actions. It is the responsibility of all board members, officers, members, management employees and volunteers to report concerns about violations of The Home Improvement Research Institute's code of ethics or suspected violations of law or regulations that govern The Home Improvement Research Institute's operations.

## **No Retaliation**

It is contrary to the values of The Home Improvement Research Institute for anyone to retaliate against any board member, officer, member, management employee or volunteer who in good faith reports an ethics violation, or a suspected violation of law, such as a complaint of discrimination, or suspected fraud, or suspected violation of any regulation governing the operations of The Home Improvement Research Institute. Any board member, officer, member management employee or volunteer who retaliates against someone who has reported a violation in good faith is subject to discipline up to and including termination of employment.

# **Reporting Procedure**

The Home Improvement Research Institute has an open-door policy and suggests that board members, members, officers, management employees or volunteers share their questions, concerns, suggestions, or complaints with HIRI's Compliance Officer. If you are not comfortable speaking with HIRI's Compliance Officer or you are not satisfied with the response, you are encouraged to speak with HIRI's Board President. Individual's receiving complaints or concerns about suspected ethical and legal violations are required to document and send notice to The Home Improvement Research Institute's Compliance Officer, who has the responsibility to investigate all reported complaints. Board members, officers, members, management employees or volunteers with concerns or complaints may also submit their concerns in writing directly to the Executive Director or HIRI's Board President.

#### Compliance Officer

The Home Improvement Research Institute's Compliance Officer is responsible for ensuring that all complaints about unethical or illegal conduct are investigated and resolved. The Compliance Officer will advise the Board of Directors of all complaints and their resolution and will report at least annually to the Board President on compliance activity relating to accounting or alleged financial improprieties.

#### **Accounting and Auditing Matters**

The Home Improvement Research Institute's Compliance Officer shall immediately notify the Board Officers of any concerns or complaint regarding corporate accounting practices, internal controls or auditing and work with the committee until the matter is resolved.

## **Acting in Good Faith**

Anyone filing a written complaint concerning a violation or suspected violation must be acting in good faith and have reasonable grounds for believing the information disclosed indicates a violation. Any allegations that prove not to be substantiated and which prove to have been made maliciously or knowingly to be false will be viewed as a serious disciplinary offense.

#### Confidentiality

Violations or suspected violations may be submitted on a confidential basis by the complainant. Reports of violations or suspected violations will be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation.

# **Handling of Reported Violations**

The Home Improvement Research Institute's Compliance Officer will notify the person who submitted a complaint and acknowledge receipt of the reported violation or suspected violation. All reports will be promptly investigated, and appropriate corrective action will be taken if warranted by the investigation.

## **Compliance Officer**

Jennifer Castenson jenniferc@buildxact.com

## **HIRI Board President**

Paul Ponsford Paul.Ponsford@deltafaucet.com

## **HIRI Executive Director**

Dave King dking@hiri.org