



Whistle-blower Policy

Purpose

The International Society for Clinical Densitometry (ISCD) committed to high standards of ethical, moral and legal business conduct. In line with this commitment, and ISCD's commitment to open communication, this policy aims to provide an avenue for contracted staff and volunteers to raise concerns and reassurance that they will be protected from reprisals or victimization for whistle-blowing.

This whistle-blowing policy is intended to cover protections for you if you raise concerns regarding ISCD, such as concerns regarding:

- incorrect financial reporting;
- unlawful activity;
- activities that are not in line with ISCD policy, including the Code of Business Conduct; or
- activities which otherwise amount to serious improper conduct.

Safeguards

Harassment or Victimization – Harassment or victimization for reporting concerns under this policy will not be tolerated.

Confidentiality – Every effort will be made to treat the complainant's identity with appropriate regard for confidentiality.

Anonymous Allegations – This policy encourages contracted staff and volunteers 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 explored appropriately, but consideration will be given to:

- The seriousness of the issue raised;
- The credibility of the concern; and
- The likelihood of confirming the allegation from attributable sources.

Bad Faith Allegations – Allegations in bad faith may result in disciplinary action.

Procedure: 1. Process for Raising a Concern

Reporting – The whistle-blower procedure is intended to be used for serious and sensitive issues. Such concerns, including those relating to financial reporting, unethical or illegal conduct, may be reported directly to: Arthur L. Herold, Esq., Webster, Chamberlain & Bear, 1747 Pennsylvania Avenue, NW, Washington, DC 20006.

Timing – The earlier a concern is expressed, the easier it is to take action.

Evidence – Although the contracted staff/volunteer is not expected to prove the truth of an allegation, the contracted staff or volunteer should be able to demonstrate to the person contacted that the report is being made in good faith.

Procedure: 2. How the Report of Concern Will Be Handled

The action taken by ISCD in response to a report of concern under this policy will depend on the nature of the concern. The Executive Committee of the ISCD Board of Directors shall receive information on each report of concern and follow-up information on actions taken.

Initial Inquiries – Initial inquiries will be made to determine whether an investigation is appropriate and the form that it should take. Some concerns may be resolved without the need for investigation.

Further Information – The amount of contact between the complainant and the person or persons investigating the concern will depend on the nature of the issue and the clarity of information provided. Further information may be sought from or provided to the person reporting the concern.

Employment-related concerns should continue to be reported through your normal channels such as your supervisor, the Executive Director, or President.