



## **Whistleblower Policy**

### **Introduction**

The Online News Association has adopted the following policies and procedures to notify employees and officers (1) of certain specific actions that are explicitly prohibited and (2) the procedures that employees may follow if there is reason to believe that any federal or state laws are being violated. Certain states have enacted their own whistleblower laws which may be applicable to employees working in those states, to the extent provided in such laws.

### **Prohibited Actions**

Commission of any of the following acts will be considered cause for immediate disciplinary action, including but not limited to, termination of employment, and may also subject employees and ONA officers to criminal liability:

1. Destroying, altering, mutilating, concealing, covering up, falsifying, or making a false entry in any records that may be connected to a matter within the jurisdiction of a federal agency or bankruptcy proceeding, in violation of federal or state law and/or regulations.
2. Altering, destroying or concealing a document, or attempting to do so, with the intent to impair the document's availability for use in an official proceeding or otherwise obstructing, influencing or impeding any official proceeding, in violation of federal or state law or regulations.
3. Fraudulently influencing, coercing, manipulating, or misleading any independent public accountant engaged in the performance of an audit of the financial statements of ONA for the purpose of rendering such financial statements misleading, in violation of federal or state law or regulations.
4. Discharging, demoting, suspending, threatening, harassing, or discriminating or retaliating in any manner against any employee, in violation of federal or state law or regulations, because of any lawful act by that employee, including (a) providing information to or assists in any investigation by ONA or by any federal agency; (b) filing or assisting in any action alleging a violation of federal or state law or regulations; or (c) knowingly taking any action harmful to any person for providing truthful information to a law enforcement officer relating to the possible commission of a federal, state or local offense.

## **Confidentiality**

ONA will treat all communications under this Policy in a confidential manner, except to the extent necessary (1) to conduct a complete and fair investigation, (2) for review of ONA operations by the ONA Board of Directors, its treasurer, ONA's accountants or ONA counsel, or (3) as otherwise required, in ONA's good faith judgment, by law or legal process or to protect the rights, property or safety of any ONA director, employee, volunteer, or member or any member of the public.

## **Retaliation**

ONA will not permit any adverse actions to be taken against any employee or other individual who in good faith reports a possible violation of law to ONA's counsel (as described below), including any concerns about questionable accounting or auditing matters, even if the report is mistaken, or against any employee or individual who assists in the investigation of a reported violation. Retaliation in any form will not be tolerated. Any act of alleged retaliation should be reported immediately and will be promptly investigated.

## **How to Report Concerns or Complaints**

Employees and others may communicate suspected violations of law or other wrongdoing, including any concerns regarding questionable accounting or auditing matters (including deficiencies in internal controls) or alleged retaliation by contacting ONA's counsel, Michael Kovaka of Cooley, LLP, by telephone at (202) 728-7093, by e-mail at [mkovaka@cooley.com](mailto:mkovaka@cooley.com) or by mail at 1299 Pennsylvania Ave., NW, #700, Washington DC 20004.

In order to be better able to respond to any information or complaint, we would prefer that you identify yourself and give us your telephone number and other contact information when you make the report.

You can be assured that any information you provide will be treated in confidence, except as provided under "Confidentiality" above. However, if you wish to remain anonymous, it is not necessary that you give your name or position in any notification. Whether you identify yourself or not, in order that a proper investigation can be conducted, please give us as much information as you can, sufficient to conduct a proper investigation, including where and when the incident occurred, names and titles of the individuals involved and as much other detail as you can provide.

## **Questions**

If you have any questions regarding this policy, please feel free to contact ONA's counsel, as indicated above.