

LUTHERAN SERVICES IN AMERICA

Statement on Reporting and Investigating Allegations Of Suspected Improper Conduct

Lutheran Services in America is committed to facilitating open and honest communications regarding its governance, finances, and compliance with all applicable laws and regulations. This statement is provided for guidance to those who may have reason to express concern about how LSA has conducted or is conducting its business and to assure them that LSA welcomes this input, will take no adverse action against those who register complaints, will investigate and resolve complaints expeditiously, and will maintain confidentiality to the greatest extent possible unless instructed or authorized otherwise by the complaining party.

It is the policy of Lutheran Services in America (LSA) to conduct business according to the highest ethical standards to maintain the complete confidence of its members, donors, volunteers, partners, directors, and employees. Directors and employees must conduct themselves and perform their duties in a manner that brings credit to themselves and LSA and in accordance with the code of conduct and conflict of interest policies. Furthermore, they must fully comply with the intent and spirit of all applicable laws and regulations and avoid practices that might damage the public trust LSA enjoys, or in any way damage LSA's reputation as a responsible non-profit organization.

Should a person reasonably suspect, experience, or observe any of the following conduct by an employee or representative of LSA:

- fraud, abuse or misuse with respect to LSA's resources or assets;
- dishonest actions or deeds;
- any acts that could constitute a conflict of interest;
- any acts of discrimination or harassment of any kind; or
- any other behavior that violates laws, regulations, or LSA's code of conduct or conflict of interest policies,

LSA requests that person report, or submit a complaint about the violation or suspected violation either directly to an LSA officer or board member, who will treat the report with confidentiality, or via the confidential and anonymous system provided by EthicsPoint, Inc. at https://secure.ethicspoint.com/domain/en/report_custom.asp?clientid=13727.

All reports or complaints submitted in accordance with this Statement will be fully investigated by LSA, and appropriate action will be taken against anyone who is found to have engaged in wrongdoing.

It is expected that any complaint will be made in good faith, and is a real and legitimate concern that the reporter believes should be addressed. Anyone who reports a violation or makes a complaint in good faith in accordance with this Statement will not suffer harassment, retaliation, or adverse employment consequences of any kind as a result of their making the report or complaint. Anyone who engages in any such harassment, retaliation or in any way affects the employment of a reporter will be subject to disciplinary action, up to and including termination of employment for employees or separation from involvement in LSA and its sponsored activities for others.

To summarize, a person reporting or making a complaint about improper conduct in accordance with this Statement can expect

- To be treated with dignity and respect,
- That personal identification is not necessary,
- That confidentiality will be protected,
- That, if an employee, there will be no adverse consequences regarding employment,
- That concerns will be taken seriously, investigated fully, with appropriate action taken,
- And, that feedback will be available.

This Statement on Reporting and Investigating Allegations of Suspected Improper Conduct is posted on LSA's website and LSA's landing page at the EthicsPoint website, is included in LSA human resources policies, and is communicated regularly to LSA's employees and board members.