

# Whistleblower Policy

**Policy Contact:** Director, Legal Affairs and Corporate Secretary

**Date of last revision:** May 4, 2018

**Department:** Legal Affairs

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## PURPOSE

Pew Research Center (Center) is committed to openness, integrity, responsibility, accountability, and lawful and ethical behavior in all of its activities. This commitment requires that all Center directors, employees and agents (including, but not limited to, consultants, contractors and employees of The Pew Charitable Trusts) conduct themselves in a manner that complies with both the letter and the spirit of all applicable laws and Center policies (together, the “Center’s Rules”).

To honor this commitment, you must immediately report if you observe, experience, or learn of a possible violation of the Center’s Rules even if it may appear to you that the conduct involved is helping to achieve a Center goal. Our goals are to be achieved *only* through the highest level of ethical conduct. Failure to report a possible violation of the Center’s Rules may result in disciplinary measures up to and including termination of employment or other relationship with the Center.

This policy aims to (i) provide an avenue for raising concerns regarding potential unlawful or unethical behavior and (ii) assure protection from reprisal as a consequence of reporting any alleged wrongdoing by any Center director, employee, or agent.

## POLICY

### Reporting Concerns

If you have a good faith concern regarding the legality or ethical propriety of any action taken or contemplated to be taken by the Center or one of its directors, employees, or agents, or if you have a good faith belief that action needs to be taken to ensure that the Center remains in compliance with the Center’s Rules, please promptly raise the matter first with your own managing director or vice president.

If you are not comfortable speaking with your managing director or vice president or you are not satisfied with her/his response, you are encouraged to speak with the director, legal affairs, the director, human resources or the president. If you prefer, you may report a possible violation through the whistleblower hotline at [www.pewresearch.ethicspoint.com](http://www.pewresearch.ethicspoint.com), which is hosted by an independent third party and permits anonymous reporting.

### Illustrative Types of Reportable Conduct

The following is a *non-exhaustive* list of the types of conduct you are obligated to report:

- Any matter involving impropriety in accounting, internal accounting controls, or auditing matters, including:
  - fraud, deliberate error, or misrepresentation (oral or written) in the preparation, maintenance,

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- evaluation, review, or audit of any financial statement, financial record, or other public document, including the Center's tax return (Form 990),
  - deficiencies in or non-compliance with the Center's internal accounting controls, policies, or procedures, or
  - providing false information to or withholding material information from the Center's auditors, directors, or officers.
- Embezzlement or other private benefit (i.e., the Center's assets being used for any person's own benefit):
    - violation of the Center's [Conflict of Interest](#), [Financial Interest Disclosure](#), Insider Trading, Respect in the Workplace, Anti-Bribery and Corruption, Confidentiality, or Whistleblower Policies;
    - violation of the Center's Gifts to Government Officials Policy;
    - payment for services or goods that are not rendered or delivered; or
    - facilitating or concealing any of the above or similar actions.

Anyone who raises a concern about possible unlawful or unethical conduct must act in good faith and have reasonable grounds for believing that the information disclosed indicates such impermissible conduct. Anyone who raises an allegation that is **both** (i) not confirmed *and* (ii) made maliciously, knowing that it is not true, or with reckless disregard for its truth, will be subject to serious disciplinary action up to and including termination and any other available legal remedies.

### Investigation

The Center will thoroughly investigate all concerns reported per this policy and take appropriate corrective action as warranted. All reports will be treated confidentially and as discreetly as reasonably possible, consistent with the Center's need to conduct an adequate investigation, implement any remedies, and satisfy legal obligations.

### No Retaliation

The Center strictly prohibits retaliation of any kind (including, but not limited to, compensation or terms, conditions, location, or privileges of employment) against anyone who in good faith reports or raises concerns under this policy. The Center likewise strictly prohibits retaliation against any individual for participating or cooperating in good faith in any investigation.

Any person who threatens or retaliates against a person who has in good faith reported a possible violation per this policy may be subject to appropriate remedial and/or disciplinary measures up to and including termination of her/his employment or other relationship with the Center and possibly civil and/or criminal liability. This non-retaliation policy is designed to assure every director, employee, and agent that the Center seriously encourages and relies on their open and frank communication of genuinely held concerns about possible unlawful or unethical conduct, regardless of how these concerns are reported or raised.

This policy of non-retaliation applies to all reports made in good faith, even if no wrongdoing is ultimately found. It does not, however, apply to any allegation that is **both** (i) not confirmed *and* (ii) made maliciously by a person either knowing that it is not true or with reckless disregard for its truth.

Material issues relating to this policy will be reported as they arise to the executive committee of the

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Center's board of directors. In addition, the director, legal affairs will present an annual report containing all whistleblower issues raised during the prior year to the board of directors.

The Center reserves the right to amend and/or supplement this policy at any time.