

MEMORANDUM

TO: TAR Employees
FM: Tom Morgan, Vice President Legal Affairs, ext 112
RE: TAR Whistleblower Policy
DT: 12/04/2008

Introduction

The Executive Board of Texas Association of REALTORS® (TAR) has adopted the Whistleblower Policy as written below. Please let me know if you have any comments, questions, or concerns.

Whistleblower Policy

Purpose. The purpose of this Whistleblower Policy is to: (1) encourage staff and volunteers to come forward with credible information on illegal practices or serious violations of adopted policies of the Texas Association of REALTORS®; (2) specify that TAR will protect the person from retaliation; and (3) identify where such information can be reported.

Encouragement of reporting. TAR encourages complaints, reports or inquiries about illegal practices or serious violations of TAR's policies, including illegal or improper conduct by TAR itself, by its leadership, or by others on its behalf. Appropriate subjects to raise under this policy would include financial improprieties, accounting or audit matters, ethical violations, or other similar illegal or improper practices or policies. Other subjects on which TAR has existing complaint mechanisms should be addressed through channels described in those mechanisms, such as raising matters of alleged discrimination or harassment, unless those channels are themselves implicated in the wrongdoing. This policy is not intended to provide a means of appeal from outcomes in those other mechanisms.

Protection from retaliation. TAR prohibits retaliation by or on behalf of TAR against staff or volunteers for making good faith complaints, reports or inquiries under this policy or for participating in a review or investigation under this policy. This protection extends to those whose allegations are made in good faith but prove to be mistaken. TAR reserves the right to discipline persons who make bad faith, knowingly false, or vexatious complaints, reports or inquiries or who otherwise abuse this policy.

Where to report. Complaints, reports or inquiries may be made under this policy on a confidential or anonymous basis. They should describe in detail the specific facts demonstrating the basis for the complaints, reports or inquiries. They should be directed to TAR's Chief Executive Officer or the TAR Chairman of the Board; if both of those persons are implicated in the complaint, report or inquiry, it should be directed to the TAR Chairman-Elect. TAR will conduct a prompt, discreet, and objective review or investigation. Staff or volunteers must recognize that TAR may be unable to fully evaluate a vague or general complaint, report or inquiry that is made anonymously.