

SOUTH CAROLINA NATIONAL HERITAGE CORRIDOR

WHISTLEBLOWER POLICY ADOPTED – NOVEMBER 9, 2009

SECTION 1. PURPOSE:

The South Carolina National Heritage Corridor (SCNHC) requires its board members to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. As representatives of the SCNHC, we must practice honesty and integrity in fulfilling our responsibilities and must comply with all applicable laws and regulations.

The purpose of this Policy is to create an ethical and open environment, to ensure that the SCNHC has a governance and accountability structure that supports its mission, and to encourage and enable board members of the SCNHC to raise serious concerns about the occurrence of illegal or unethical actions within the SCNHC.

SECTION 2. REPORTING RESPONSIBILITY:

All board members of the SCNHC have a responsibility to report any action or suspected action taken within the SCNHC that is illegal, unethical or violates any adopted policy of the SCNHC ("Violation"). Anyone reporting a Violation must act in good faith, without malice to the organization or any individual in the organization and have reasonable grounds for believing that the information shared in the report indicates a Violation has occurred. A person who makes a report does not have to prove that a Violation has occurred. However, any report which the reporter has made maliciously or any report which the reporter has good reason to believe is false will be viewed seriously and may be grounds for removal of the reporter from the board.

SECTION 3. NO RETALIATION:

It is the intent of the SCNHC to adhere to all laws and regulations that apply to the SCNHC and the underlying goal of this policy is to support the organization's goal of legal compliance. The support of all board members is necessary to achieving compliance with various laws and regulations. A board member is protected from retaliation only if the board member brings the alleged Violation to the attention of the SCNHC and provides the SCNHC with a reasonable opportunity to investigate and correct the alleged Violation. The protection described herein is only

available to board members that comply with this requirement. The SCNHC will not retaliate against a board member who in good faith, has made a protest, raised a complaint, or disclosed or threatened to disclose a Violation, on the basis of a reasonable belief that a Violation has occurred.

Any board member of the SCNHC who retaliates against another board member who has reported a Violation in good faith or who, in good faith, has cooperated in the investigation of a Violation is subject to subject to removal from the board.

SECTION 4. REPORTING PROCESS:

All board members should direct their concerns relating to a Violation to the Director and/ or the Compliance Officer.

The SCNHC encourages anyone reporting a Violation to identify him or herself when making a report in order to facilitate the investigation of the Violation. However, reports may be submitted on a confidential basis or anonymously by submitting them in writing to the Compliance Officer.

SECTION 5. COMPLIANCE OFFICER:

The Director will notify the Compliance Officer of every report of a Violation. The Compliance Officer will notify the initial reporter of the Violation and acknowledge receipt of a report of Violation within five business days, but only if the initial reporter's identity is disclosed or a return address is provided.

The Compliance Officer is responsible for promptly investigating all reported Violations and for causing appropriate corrective action to be taken if warranted by the investigation. If the investigation implicates or involves an employee of SCNHC, the Compliance Officer will immediately refer the matter to the South Carolina Department of Parks, Recreation and Tourism to be handled in its discretion and in accordance with its policies and procedures.

The audit committee of the board is responsible for addressing all reported concerns or Violations relating to corporate accounting practices, internal controls or auditing. Therefore, the Compliance officer must immediately notify the audit committee of any such concern or complaint. In addition, if the Compliance Officer deems it appropriate,

the Compliance Officer may advise the full board of any other reported Violations.

The Compliance Officer has direct access to the board and is required to report to the board at least annually on compliance activity.

The Compliance officer for SCNHC is John Singh.
He may be reached at 803-533-6000 or PO Box 387, Orangeburg, South Carolina 29116.

I HEREBY CONFIRM that I have read and understand SCNHC's Whistleblower Policy.

Signature

Date