



TEXAS WINDSTORM
INSURANCE ASSOCIATION



TEXAS FAIR PLAN
ASSOCIATION

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History

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Introduction

1.0 Background

The Texas Windstorm Insurance Association (TWIA) and Texas FAIR Plan Association (TFPA) (the “Association”) are insurance organizations providing essential property insurance products and services to eligible Texas properties when no one else will. In accomplishing this mission, we share a vision to be respected and trusted by our stakeholders.

1.1 Applicability

This Policy applies to all individuals serving on the TWIA Board of Directors, the TFPA Governing Committee (together, “board members”) all Association employees and contractors. Collectively, this group shall be known as “individuals subject to this Policy.”

1.2 Purpose

The Association is committed to the highest possible standards of ethical, moral, and legal business conduct. This Policy is intended to encourage and enable serious concerns to be raised internally so that the Association can address and correct inappropriate conduct and actions. Furthermore, this Policy aims to provide reassurance for reporters that they will be protected from reprisals or victimization when making a whistleblower report in good faith. It is the responsibility of all individuals subject to this Policy to report concerns about violations of the Association’s policies or suspected violations of law or regulations that govern the Association’s operations.

Examples of potential concerns that should be reported are actions that:

- May lead to incorrect financial reporting;
- Are unlawful;
- Are not in line with company policies, including the Ethics Policy; or
- Otherwise amount to serious improper conduct.

Regular business matters should be reported as provided for in the Employee Handbook and are not addressed by this policy.

Safeguards

2.0 Acting in Good Faith

Anyone making a whistleblower report must do so acting in good faith, having reasonable grounds for believing that the information disclosed indicates a violation.

2.1 Malicious Reports

Malicious reports may result in disciplinary action.

2.2 No Retaliation

It is contrary to the values of the Association for anyone to retaliate against any individual subject to this Policy, who in good faith makes a whistleblower report. Harassment or victimization of the complainant will not be tolerated.

2.3 Confidentiality

Every effort will be made to protect the reporter's identity by our hotline vendor. The information provided in a hotline report may be the basis of an internal and/or external investigation by the Association into the issue being reported. Therefore, it is possible that as a result of the information provided in a report, the reporter's identity may become known during the investigation.

2.4 Anonymous Report

This Policy allows reporters to remain anonymous if they would prefer. If a report is submitted anonymously communication will be made with the reporter via Lighthouse Services. Concerns expressed anonymously will be explored appropriately, but consideration will be given to:

- The seriousness of the issue raised;
- The credibility of the concern; and
- The likelihood of confirming the allegation from attributable sources.

Reporting

3.0 Lighthouse Services

The earlier a concern is reported, the easier it is for the Association to take appropriate action. Whistleblower reports can be made to the Association’s third-party vendor, Lighthouse Services, in the following ways:

Telephone:	English (877) 472-2110 Spanish (800) 216-1288
Online:	www.lighthouse-services.com/TWIA Click ‘submit incident report’
Email:	reports@lighthouse-services.com Must include company name with report
Fax:	(215) 689-3885 Must include company name with report

When a whistleblower report is submitted to Lighthouse Services, an alert will be received by designated members of the Executive Leadership Team as detailed below:

Complaint Type	ELT Members Alerted
HR	General Manager VP of HR and Administration VP of Legal & Compliance Outside Counsel
Fraud/Ethics & Compliance	General Manager VP of Legal & Compliance Outside Counsel

Process

4.0 Review of Complaint

The action taken will depend on the nature of the concern.

4.1 Initial Inquiries

Initial inquiries will be made to determine whether an investigation is appropriate, and the form that it should take. Some concerns may be resolved by agreed upon action without the need for an investigation.

4.2 Feedback to the Reporter

Whether reported directly to Association personnel or through Lighthouse Services, the individual submitting the report will be given the opportunity to receive follow-up on their concern:

- Acknowledging that the concern was received;
- Indicating how the matter will be addressed;
- Giving an estimate of the time that it will take to complete the investigation;
- Telling them whether initial inquiries have been made;
- Telling them whether further investigations will follow, and if not, why not.

4.3 Further Information

The amount of contact between the reporting person and the body investigating the report will depend on the nature of the issue, the clarity of information provided and whether the reporting person remains accessible for follow-up. Further information may be sought from the reporting person.

4.4 Outcome

At the discretion of the company and subject to legal and other constraints the reporter may be entitled to receive information about the outcome of an investigation.



4.5 Final Report

The Chair of the Board of Directors and the Governing Committee will receive the final investigation reports.