

# **East Bde Maka Ska Neighborhood Association Whistleblower Policy**

## **I. Purpose**

East Bde Maka Ska Neighborhood Association (“the Organization”), state and federal law require all of Organization's directors, officers, and employees (whether those are paid staff, contractors, or volunteers) to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. All employees and representatives of the Organization must practice honesty and integrity in fulfilling their responsibilities and comply with the laws.

Therefore, the Organization will investigate complaints of suspected fraudulent or dishonest use or misuse of its resources or property by staff, board members, consultants, volunteers, or members. To maintain the highest standards of service, the Organization will also investigate complaints concerning its programs and services.

This policy supplements, and does not replace, any procedures required by law, regulation, or funding source requirements.

## **II. Reporting Responsibility**

This Whistleblower Policy is intended to encourage and enable employees and others to raise serious concerns internally so that the Organization can address and correct inappropriate conduct and actions appropriately.

It is the responsibility of all board members, officers, employees, members, and volunteers to report concerns about violations of the Organization’s Conflicts of Interest Policy, code of conduct or suspected violations of law or regulations that govern the Organization’s financial operations.

## **III. No Retaliation**

An employee, director or officer who retaliates against someone who has reported a violation in good faith is subject to discipline up to and including termination of employment.

## **IV. Designated Compliance Officer**

The Organization’s Vice President will serve as Compliance Officer and is responsible for ensuring that all complaints about unethical or illegal conduct are investigated and resolved.

The Compliance Officer will advise the Board of Directors of all complaints and their resolution. They will also report at least annually to the Board on compliance activity relating to accounting or alleged financial improprieties.

The Compliance Officer may be a third party designated by the organization to receive, investigate, and respond to complaints or a particular complaint.

## **V. Reporting Procedure**

The Organization has an open-door policy and suggests that employees share their questions, concerns, suggestions, or complaints with their supervisor. If you are not comfortable speaking with your supervisor or you are not satisfied with your supervisor's response, you are encouraged to speak with any board member.

## **VI. Confidentiality**

Violations or suspected violations may be submitted anonymously or confidentially by the complainant. Reports of violations or suspected violations will be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation.

## **VII. Accounting and Auditing Matters**

The Organizations Compliance Officer will immediately notify the Board of any concerns or complaint regarding corporate accounting practices, internal controls or auditing and work with the appropriate body or committee until the matter is resolved.

## **VIII. Acting in Good Faith**

Anyone filing a written complaint concerning a violation or suspected violation must be acting in good faith and have reasonable grounds for believing the information disclosed indicates a violation. Any allegations that prove not to be substantiated and which prove to have been made maliciously or knowingly to be false will be viewed as a serious disciplinary offense.

## **IX. Handling of Reported Violations**

The Organization's Compliance Officer will notify the person who submitted a complaint and acknowledge receipt of the reported violation or suspected violation. All reports will be promptly investigated, and appropriate corrective action will be taken if warranted by the investigation.

### **Approval & Adoption**

Approved and adopted by a vote of the Board of Directors at a properly conducted meeting.

Approved by the Board of Directors on August 5, 2021.