

Whistleblower Policy

Approved: March 2020

Purpose:

This policy provides a mechanism for employees and volunteers who have become aware of a violation of policy or law, to report without fear of retaliation or retribution. It is intended to encourage fmi*igf Board members, staff (paid and volunteer) and others to report suspected or actual occurrence(s) of illegal, unethical or inappropriate events (behaviors or practices).

Scope:

This policy applies to all National Board of Director members, National Office staff, Chapter Presidents, the Finance and Audit Committee members, and the Chapter Advisory Committee members, or duly appointed Chapter representatives, PD Week Chair, volunteers and vendors/contractors of fmi*igf.

Principles:

All communication should be respectful and professional.

Anyone reporting a concern must act in good faith and have reasonable grounds for believing the information disclosed indicates an improper accounting or auditing practice, or a violation of the code.

The act of making allegations that prove to be unsubstantiated, and that prove to have been made maliciously, recklessly, or with the foreknowledge that the allegations are false, will be subject to disciplinary action, including possible termination of employment or other legal means to protect the reputation of the organization and members of its Board and staff.

Process and Protocol:

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 the organization has existing complaint mechanisms should be addressed under those mechanisms, such as raising matters of alleged discrimination or harassment through the organization's existing hierarchy or reporting structure, 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.

In situations where individuals have raised a concern without satisfactory conclusion to the identified primary communication point, the following protocol should apply.

A written explanation of the issue and results, or lack thereof, to date, should be forwarded simultaneously to two National Board of Directors. In most cases, the Governance Director should be one of the two Board members. In cases where the Governance Director is unable to be included in the communication, any two Board members will suffice, and of those two, one will take on the lead role in further communication and act as the Governance Director. The Director assuming the role of Governance Director will communicate this to the individual raising the issue.

In situations where more than one individual share the same concern, each individual should follow the process as described above. After consultation with all individuals who have submitted a concern, the Governance Director may modify the process to manage multiple submissions.

The report will be acknowledged in writing within 5 working days, and the individual will be advised if their concern is within the scope of the whistleblower policy. The response should include an overview of the investigative plan.

Reports of concerns and investigations pertaining to said concerns, shall be kept confidential to the extent possible consistent with the need to conduct an adequate investigation.

The identity of the Individual, if known, shall remain confidential to those persons directly involved in applying this policy, unless the issue requires investigation by law enforcement, in which case members of the organization are subject to subpoena.

All reports of concerns will be promptly investigated by the Governance Director and the other notified Board Director, and appropriate corrective action will be recommended to the Board of Directors, if warranted by the investigation.

Action taken must include a conclusion or follow-up, or both, with the complainant for complete closure of the concern.

The Governance Director may determine that the Governance Committee should be included in the investigation process, or be the primary investigative body.

The Governance Director has the authority to retain outside legal counsel, accountants, private investigators or any other resource deemed necessary to conduct a full and complete investigation of the allegations. Factors to be considered include, but are not limited to, how credible and serious a complaint appears, and the potential legal or financial ramifications if the allegations are ultimately proven true.

The Governance Director will report on the complaint and the current status of the investigation to the Board of Directors in writing, within 10 working days of the initial report.

Within 20 working days of the initial report, the Governance Director will respond to the complainant in writing, advising of the report of the investigation, disposition or resolution of the issue.