

# Whistleblower and Fraud Reporting Policy

## Purpose

The objectives of the Whistleblower and Fraud Reporting Policy (“Policy”) are to establish policies and procedures for:

1. Reporting concerns regarding:
  - a. Questionable accounting or auditing matters
  - b. Violation(s) of a state or federal statute
  - c. Violation(s) or noncompliance with a state or federal rule or regulation
  - d. Violation(s) of Foundation policies and procedures
  - e. Unsafe working conditions or work practices while engaged in Foundation business
  - f. Filing a concern regarding any item noted above in a-e will be conducted in a confidential and anonymous basis
2. Receipt and treatment of complaints received by the organization regarding such concerns.
3. Protection of employees, directors, volunteers and other stakeholders reporting concerns from retaliatory actions.

## Reporting Responsibility

Each director, employee, volunteer, or other stakeholder of the Foundation has an obligation to report questionable or improper accounting or auditing matters or other violations as described above (“Concerns”).

## Authority of Audit Committee

The Audit Committee will be responsible for investigating reported concerns including those already addressed by the President & CEO and making appropriate recommendations as outlined on page two of this document regarding those concerns.

## No Retaliation

This Policy is intended to encourage and enable directors, employees, and volunteers to raise concerns within the Foundation for investigation. No individual who reports a concern in good faith shall be subject to retaliation or, in the case of an employee, adverse employment consequences. Any director, volunteer or

employee who retaliates against someone who has reported a concern in good faith is subject to discipline up to and including dismissal from their position or termination of employment.

## Reporting Concerns – Procedures

### General

This statement will be issued to new employees, directors and other stakeholders when they become associated with the Foundation. This Policy and contact information for the Chair of the Audit Committee will be available online at [www.alaskacf.org](http://www.alaskacf.org) under the *Advisor* tab, *Tools & Resources* section.

### Employees

If appropriate (please see following paragraph), an employee should first discuss his/her concern with the President & CEO. If, after that discussion, the individual continues to have reasonable grounds to believe the concern is valid, he or she should report the concern to the chair of the Audit Committee, then with the support of the Audit Committee Chair report to the chair of the Board of Directors.

If the employee has reasonable concerns addressing the President & CEO, or the President & CEO is the subject of the concern, he/she should report the concern directly to the chair of the Audit Committee (unless he/she is involved in the concern), then the employee should report the concern directly to the Chair of the Board of Directors (unless he/she is involved in the concern). In the event any of the previously mentioned individuals is unavailable (or involved in the concern) any member of the Audit Committee may be approached. Concerns may also be submitted anonymously in writing.

### Directors and Other Stakeholders

Directors, volunteers, and other stakeholders should submit concerns in writing to the Chair of the Audit Committee.

### Handling of Reported Violations

The Audit Committee and or the President & CEO shall promptly investigate all reported concerns. The chair of the Audit Committee shall immediately notify the Audit Committee and the President & CEO (unless he or she is involved in the concern). In the case of non-anonymous reports, the Chair will notify the sender and acknowledge receipt of the concern within five business days. If warranted, the Audit Committee may recommend corrective action to the Board of Directors. Any actions taken must include follow-up with the complainant.

The Audit Committee 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.

### Acting in Good Faith

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 policies and procedures of the Foundation. The act of making allegations that prove to be unsubstantiated, and that prove to have been made frivolously, maliciously, recklessly, or with the foreknowledge that the allegations are false, will be viewed as a serious disciplinary offense and may result in discipline, up to and including dismissal from the volunteer position or termination of employment. Such conduct may also give rise to other actions, including civil lawsuits.

### Confidentiality

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

individuals not involved in the investigation will be viewed as a serious disciplinary offense and may result in discipline, up to and including termination of employment and or dismissal from a volunteer position. Such conduct may also give rise to other actions, including civil lawsuits.

### **Conflicts of Interest**

If the complaint involves the Audit Committee Chair, the President & CEO, or anyone charged with investigating the report, the involved individuals(s) will not be permitted to participate in the consideration of the complaint or determine the action to be taken in response. In the event that the Audit Committee Chair has a conflict of interest, the investigation will be assigned by the next individual on the following list without a conflict of interest: Board Chair, Vice Chair, Treasurer.

### **Policy Distribution**

This policy will be available online at [www.alaskacf.org](http://www.alaskacf.org) under the *Advisor* tab, *Tools & Resources* section and will be distributed to all employees, directors, volunteers and other stakeholders of the Foundation.

## Policy Adoption, Review, and Revision History

### Policy: Whistleblower and Fraud Reporting Policy

Date	Action taken	Comments
2012.02.16	Approved by ACF Board	
2015.05.19	Approved by ACF Board	
2017.11.16	Approved by ACF Board	

**Next Bi-Annual Review Date: November 2019**