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**more food. more good.**

## **whistleblower policy**

FeedMore WNY Code of Conduct requires directors, council members, employees and volunteers to observe the highest possible standards of ethical, moral, legal, business and personal conduct in carrying out their duties and responsibilities. Employees and representatives of the organization must practice honesty and integrity in fulfilling their responsibilities and comply with all applicable laws and regulations.

FeedMore WNY's reputation and standing in the community are among our most precious assets. Management and the Boards of Directors are most interested in hearing immediately of any concerns of any employee or volunteer or other stakeholder relative to any issue which may threaten this asset.

FeedMore WNY is committed to providing accurate and reliable information in its financial records. No false, misleading, or artificial entries shall be made in the FeedMore WNY books and records for any reason, and all accounting, internal controls, or auditing matters shall be conducted in accordance with all applicable laws and Generally Accepted Accounting Principles (GAAP). The organization is also committed to achieving compliance with all federal and state labor laws, regulations governing charitable organizations and corresponding standards and practices. This policy aims to provide an avenue to raise concerns with the reassurance that FeedMore WNY will provide protection from reprisals or victimization for whistle blowing in good faith.

The Whistleblower Policy is intended to cover serious concerns that could have an impact on FeedMore WNY from such actions that:

May lead to incorrect financial reporting;

Are unlawful;

Are not in line with FeedMore WNY policy;

Otherwise amount to serious improper conduct, to include:

The receipt, retention, and treatment of complaints received by the organization regarding questionable accounting, internal controls or auditing matters by employees, directors, officers, and other stakeholders of the organization.

### **safeguards**

Harassment, victimization or retaliation will not be tolerated. This Whistleblower Policy is intended to encourage and enable directors, council members, volunteers, employees and other stake holders in the organization to raise concerns within the organization for investigation and appropriate action. With this goal in mind, no one who, in good faith, reports a concern shall be subject to retaliation or, in the case of an employee, adverse employment consequences. Moreover, anyone who retaliates against someone who has reported a concern in good faith is subject to discipline up to and including dismissal from the volunteer position or termination of employment.

### **confidentiality**

Reasonable effort will be made to protect the complainant's identity, subject to the FeedMore WNY need to investigate and address the complaint. The person submitting a complaint should include a telephone number in the submission at which he or she may be contacted if it is determined that contact is appropriate and necessary. 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 dismissal from the volunteer position or termination of employment. Such conduct may also give rise to other actions, including civil lawsuits.

### **anonymous allegations**

The policy encourages directors, council members, employees, volunteers and other stake holders in the organization to put their names to allegations because appropriate follow-up questions and investigation may

not be possible unless the source of the information is identified. Claims may be submitted anonymously, but it is hoped that these be in writing.

Concerns expressed anonymously will be investigated, but consideration will be given to:

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

### **malicious allegations**

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 and may result in disciplinary action up to and including dismissal from the volunteer position or termination of employment.

## **procedure**

### **reporting**

FeedMore WNY's open door policy suggests that employees share their questions, concerns, suggestions or complaints with an immediate supervisor or someone in management whom they are comfortable approaching. Supervisors and managers are required to report suspected violations to the President/ CEO who has specific responsibility to investigate all reported violations. For suspected fraud, or when the individual is not satisfied or comfortable with the open door policy, individuals should contact a member of the Board's Executive Committee.

A concern may be presented verbally or in writing as best fits the situation. The individual(s) receiving the information will be responsible for investigating, and making appropriate recommendations to correct the activity. The Board of Directors' Executive Committee will be informed of all concerns and will have specific and exclusive responsibility to oversee the investigation of all concerns. If, for any reason, the original receiver of the information does not promptly respond to the concern, the reporting individual should directly report the concern to the next person(s) in authority (as outlined above). The Chair of the Boards' Joint Personnel Committee will maintain a log of concerns or complaints, tracking their receipt, investigation and resolution and shall prepare a periodic summary report for the Board Copies of complaints.

### **timing**

The earlier a concern is expressed, the easier it is to take action. The individual(s) reporting the concern will receive an acknowledgement of the concern within five business days. It will not be possible to acknowledge receipt of anonymously submitted concerns. All reports will be promptly investigated and appropriate corrective action will be recommended to members of the Board's Executive Committee, if warranted by the investigation. In addition, action taken must include a conclusion and/or follow-up with the complainant for complete closure of the concern. FeedMore WNY has the authority to retain outside legal counsel, accountants, private investigators, or any other resources deemed necessary to conduct a full and complete investigation of the allegations.

### **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 FeedMore WNY code of conduct. 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 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.