

FBFN FOUNDATION WHISTLEBLOWER POLICY

GENERAL POLICY

All members, directors and officers of FBFN Foundation will be protected from any disadvantage caused by raising legitimate concerns and shall report suspected illegal activities within the organization.

PURPOSE

FBFN Foundation encourages its members, directors and officers to maintain high ethical standards. This whistleblower policy is meant to provide a confidential and effective means for reporting suspected violations of the law. It further serves to protect individuals who report suspected violations from retaliation in any form.

SAFEGUARDS

Confidentiality

An individual may report a suspected violation anonymously or on a confidential basis, keeping in mind that in the course of the investigation it may become necessary that the source of the complaint be identified.

Retaliation

No individual who reports a suspected violation in good faith, whether or not the allegation turns out to be correct, shall be subject to any form of retaliation, including harassment, or removal, by FBFN Foundation or its members. Anyone who retaliates against a complainant shall be subject to disciplinary action.

FBFN Foundation will not retaliate against members who disclose or threaten to disclose to an officer, director or any public body, any activity, policy, or practice of FBFN Foundation that the member reasonably believes is in violation of a law, or a rule or regulation mandated pursuant to law, or is in violation of a clear mandate or public policy concerning the health, safety, welfare, or protection of the environment.

Malicious Allegations

An individual is not required to prove the truth of an allegation, but is required to act in good faith. Any individual who does not act in good faith in reporting a suspected violation may be subject to disciplinary action, including expulsion from the organization.

PROCEDURE

Open Door Policy

If a member reasonably believes that some policy, practice or activity of FBFN Foundation is in violation of the law, or a clear mandate or public policy, the member should share their questions, concerns, suggestions, or complaints with an officer or director who may be able to address them properly. If the concerns are not addressed, the individual should make a formal complaint as outlined below.

Reporting Violations

If an individual reasonably believes that some practice of FBFN Foundation, a member of the board of directors or a board committee, any member, or another individual or entity with whom the organization has a business relationship is in violation of the law, the employee must file a written complaint with the Board President.

Handling Reported Violations

The Board President will contact the complainant within 10 business days and acknowledge the reported violation was received. The complainant will be notified about what actions will be taken. If no further action or investigation is to follow, an explanation for the decision will be given to the complainant.

Any complainant who reasonably believes they have been retaliated against in violation of this whistle blower policy shall follow the same procedures as they did when they filed the original complaint.

The Policy was adopted by the Board of Directors on October 12, 2012.