

## **American Friends of Migdal Ohr (AFMO) Whistleblower Policy**

AFMO's Code of Ethics requires directors, officers, employees, and volunteers to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. As employees and representatives of AFMO, we must practice honesty and integrity in fulfilling our responsibilities and comply with all applicable laws and regulations.

### **II. Reporting Responsibility**

It is the responsibility of all directors, officers, employees, and volunteers to comply with and to report violations or suspected violations of the Code of Ethics, AFMO policies, or laws in accordance with this policy.

### **III. No Retaliation**

No director, officer, employee, volunteer, or contractor who in good faith reports a violation of the Code, AFMO policies, or law shall suffer harassment, retaliation or adverse employment consequence. An employee who retaliates against someone who has reported a violation in good faith is subject to discipline up to and including termination of employment. This Whistleblower Policy is intended to encourage and enable employees and others to raise serious concerns within AFMO prior to seeking resolution outside AFMO.

### **IV. Reporting Violations**

Directors, officers, employees, and volunteers should share their questions, concerns, suggestions or complaints with someone who can address them properly. In most cases, employees and volunteers should report to the AFMO Executive Director. However, if an employee or volunteer is not comfortable speaking with the Executive Director or is not satisfied with the response, that employee or volunteer is encouraged to report to any officer of the Board.

### **V. Acting in Good Faith**

Any good faith report, concern or complaint is fully protected by this policy, even if the report, question or concern is, after investigation, not substantiated. Anyone filing a complaint concerning a violation must be acting in good faith and have reasonable grounds for believing the information disclosed indicates a violation of the Code, AFMO policy, or law. Any allegations that prove not to be substantiated and have been made maliciously or with knowledge that they were false will be treated as a serious disciplinary offense.

### **VI. Confidentiality**

Upon the request of the complainant, AFMO will use its best efforts to protect the confidentiality of the complainant for any good faith report. Violations or suspected violations may be submitted on a confidential basis by the complainant or may be submitted anonymously. Reports of violations or suspected violations will be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation.

### **VII. Handling of Reported Violations**

All reports will be promptly investigated and appropriate corrective action will be taken if warranted by the investigation. The complainant will be informed that follow-up has or is occurring within two weeks after the Executive Director or board officer has received the complaint or report. The Executive Committee shall be informed of all such complaints or reports.