

## **FDR Memorial Legacy Committee Whistleblower Policy August 2023**

The FDR Memorial Legacy Committee (FDR Committee) requires the Board of Directors, Advisory Board, employees, volunteers, and consultants (referred to below as “personnel”) to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. As representatives of the FDR Committee, we must practice honesty and integrity in fulfilling our responsibilities and comply with all applicable laws and regulations.

### **Reporting Responsibility**

This Whistleblower Policy is intended to encourage and enable personnel to raise serious concerns internally so that the FDR Committee can address and correct inappropriate conduct and actions. It is the responsibility of all personnel to report concerns about violations of the FDR Committee’s [policies on diversity, EEO, nondiscrimination and sexual harassment](#) or suspected violations of law or regulations that govern the FDR Committee’s operations.

### **No Retaliation**

It is contrary to the values of the FDR Committee for anyone to retaliate against any personnel who in good faith reports an ethics violation, or a suspected violation of law, such as a complaint of discrimination, or suspected fraud, or suspected violation of any regulation governing the operations of the FDR Committee. Personnel who retaliate against someone who has reported a violation in good faith is subject to discipline up to and including termination of employment, contract and/or service to and involvement with the organization.

### **Reporting Procedure**

The FDR Committee has an open-door policy and suggests that personnel share their questions, concerns, suggestions, or complaints with either the Executive Director or Chair of the Board of Directors. If you are not comfortable speaking with the Executive Director or Chair of the Board of Directors, you should then reach out to the Vice Chair of the Board of Directors.

The Executive Director, Chair and Vice Chair of the Board of Directors are required to report complaints or concerns about suspected ethical and legal violations in writing to the full Board of Directors immediately. The Executive Director, Chair and Vice Chair of the Board are responsible for ensuring that all complaints about unethical or illegal conduct are investigated and resolved. They will jointly report at least annually to the Board of Directors on compliance activity relating to any improprieties.

### **Accounting and Auditing Matters**

Any personnel shall immediately notify the Executive Director or Chair of the Board of Directors of any concerns or complaint regarding corporate accounting practices, internal controls or auditing and work with the committee until the matter is resolved. If it is not comfortable to share that information with the Executive Director or Chair of the Board of Directors, you should then reach out to the Vice Chair of the Board of Directors.

### **Acting in Good Faith**

Anyone filing a written complaint concerning a violation or suspected violation must be acting in good faith and have reasonable grounds for believing the information disclosed indicates a violation. 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.

Confidentiality violations or suspected violations may be submitted on a confidential basis by the complainant to the Executive Director, or Chair of the Board. If it is not comfortable to share that information with the Executive Director or Chair of the Board of Directors, you should then reach out to the Vice Chair of the Board of Directors. Reports of violations or suspected violations will be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation.

### **Handling of Reported Violations**

The FDR Committee's Executive Director or Board Chair will notify the person who submitted a complaint and acknowledge receipt of the reported violation or suspected violation. All reports will be promptly investigated, and appropriate corrective action will be taken if warranted by the investigation.

Policy approved by the Board of Directors on {Date}.

Contact information:

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