# Samaritans Feet International Confidential Reporting of Financial Impropriety or Misuse Of the Organization's Resources Policy (Whistleblower Policy)

## **Statement of Purpose**

The purpose of the Confidential Reporting of Financial Impropriety or Misuse of the Organization's Resources Policy is to afford all employees, volunteers, or any other person affiliated with Samaritans Feet International (hereafter Samaritans Feet), the opportunity to confidentially report known or suspected financial improprieties or misuse of Samaritans Feet resources without fear of retaliation.

# **Policy**

## **Reporting Known or Suspected Financial Improprieties**

Reports of known or suspected financial improprieties on the part of an employee or a volunteer or any other person affiliated with Samaritans Feet should be made to the Treasurer, who is the Chair of the Finance Committee. The report should be written and made as soon as possible after the events that gave rise to the report. The report should set forth in detail the basis for the individual's concern of financial impropriety or misuse of resources. The Treasurer shall date and log all written reports of known or suspected financial improprieties or misuse of resources. He/She will also acknowledge receipt of the report and confirm to the "complainant" the matter is under review.

The Treasurer and President will conduct a preliminary review of the reported situation and determine the appropriate course of action. If the President or Treasurer is named in the report, the Vice Chair of the Board of Directors will perform all duties the President or Treasurer would otherwise have performed in a review and investigation of financial impropriety or misuse of resources.

If it is determined a formal investigation should be conducted, the matter will be turned over to the Samaritans Feet Executive Committee. If it is determined that a formal investigation is not necessary, the complainant may report their suspicions to the Chair of the Board. The Board Chair will then determine if further action is necessary.

#### **Investigation**

The Treasurer or his/her designee (usually the President, if the President was not named in the report), will investigate the matter, meeting separately with all individuals named in the report, and with others who may have knowledge of the facts set forth in the report. Samaritans Feet will treat all financial impropriety reports, the sources of such reports and their investigation confidentially, recognizing, however, that in the course of investigating and resolving these matters some dissemination of information to others may be necessary and/or appropriate, particularly if legal action ensues. On completion of the investigation, the Treasurer will report his/her findings and conclusions to the President and the Executive Committee. Based upon the report by the Treasurer, the Executive Committee will determine if, and in what form and manner, additional action will be taken. As appropriate and as determined by the President and the Executive Committee, a full report of the incident will be made to the Board of Directors at the time of the next scheduled meeting.

# "Appeal" Review

Depending on the circumstances and at the discretion of the Executive Committee, persons implicated in the report and investigation of financial impropriety or misuse of resources may be given the opportunity to meet with the Executive Committee for further review and discussion of the matter. The involved party(s) must submit a written request for review of the matter by the Executive Committee. On completion of the "appeal" review, the person(s) will receive an oral explanation of the conclusions reached and the reasons for those conclusions. Decisions resulting from "appeal" reviews by the Executive Committee will be final.

### Non-retaliation

If an individual filed a financial impropriety report in good faith, the individual will not be disciplined or otherwise penalized because of the report, regardless of whether or not the report is sustained. If it appears that a financial impropriety report was not filed in good faith, and the report did not name the President, disciplinary action may be taken as determined by the President and/or the Executive Committee. If the report was not filed in good faith and the report named the President, disciplinary action may be taken as determined by the Executive Committee.

#### **Contact Information**

The phone number of the Treasurer will be available upon request.