



## **THE BERNADOTTE FOUNDATION FOR CHILDREN'S EYECARE, INC. WHISTLEBLOWER POLICY**

### **General**

The Code of Ethics and Conduct ("Code") of the Bernadotte Foundation for Children's Eyecare, Inc. (the "Foundation") requires directors, officers and employees to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. As employees and representatives of the Organization, we must practice honesty and integrity in fulfilling our responsibilities and comply with all applicable laws and regulations.

### **Reporting Responsibility**

It is the responsibility of all directors, officers, consultants and employees to comply with the Code and to report violations or suspected violations in accordance with this Whistleblower Policy.

### **No Retaliation**

No director, officer, consultant or employee who in good faith reports a violation of the Code 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 the Organization prior to seeking resolution outside the Organization.

### **Reporting Violations**

The Code addresses the Organization's open door policy and suggests that all personnel share their questions, concerns, suggestions or complaints with someone who can address them properly. In most cases, either the President, Chairman or Secretary is in the best position to address an area of concern. You are encouraged to speak with one of the foregoing officers with whom you are comfortable in approaching. The Secretary has specific and exclusive responsibility to investigate all reported violations. For suspected fraud, or when you are not satisfied or uncomfortable with following the Organization's open door policy, individuals should contact any of the above Officers directly.

### **Compliance Officer**

The Organization's Secretary is responsible for investigating and resolving all reported complaints and

allegations concerning violations of the Code and, at his discretion, shall advise the Chairman or President. The Secretary has direct access to the board of directors and is required to report to the Board at least annually on compliance activity.

### **Accounting and Auditing Matters**

The audit committee of the board of directors or the Board if no audit committee has been selected shall address all reported concerns or complaints regarding corporate practices, internal controls or auditing. The Treasurer or any assistant shall immediately notify the audit committee of any such complaint and work with the committee until the matter is resolved.

### **Acting in Good Faith**

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

### **Handling of Reported Violations**

The Secretary will notify the sender and acknowledge receipt of the reported violation or suspected violation within five business days. All reports will be promptly investigated and appropriate corrective action will be taken if warranted by the investigation.

Audit Committee Compliance Officer

{organization name} Management Staff

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