



NAFC WHISTLEBLOWER POLICY

Purpose

The National Association of Free & Charitable Clinics (NAFC) is committed to high standards of ethical, moral and legal business conduct. In line with this commitment, and NAFC's commitment to open communication, this policy aims to provide an avenue for employees to raise concerns and reassurance that they will be protected from reprisals or victimization for whistleblowing.

This whistleblowing policy is intended to cover protections for you if you raise concerns regarding NAFC, such as concerns regarding:

- incorrect financial reporting;
- unlawful activity;
- activities that are not in line with NAFC's policies, or
- activities, which otherwise amount to serious improper conduct.

Safeguards

Harassment or Victimization - Harassment or victimization for reporting concerns under this policy will not be tolerated.

Confidentiality - Every effort will be made to treat the complainant's identity with appropriate regard for confidentiality.

Anonymous Allegations - This policy encourages employees to put their names to allegations because appropriate follow-up questions and investigation may not be possible unless the source of the information is identified. Concerns expressed anonymously will be explored appropriately, but consideration will be given to:

- The seriousness of the issue raised;
- The credibility of the concern; and
- The likelihood of confirming the allegation from attributable sources.

Bad Faith Allegations - Allegations in bad faith may result in disciplinary action.

Procedure: 1. Process for Raising a Concern

Reporting- The whistleblowing procedure is intended to be used for serious and sensitive issues. Such concerns, including those relating to financial reporting, unethical or illegal conduct, may be reported directly to:

Anthony L Young, ESQ
Kleinfeld, Kaplan & Becker LLP
1140 Nineteenth Street NW

National Association of Free & Charitable Clinics
1800 Diagonal Road Suite 600, Alexandria VA 22314
703-647-7427 – info@nafcclinics.org - www.nafcclinics.org



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Washington DC 20036
202-223-5120 (O)
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Employment-related concerns should continue to be reported through your normal channels such as the Executive Director or to the President of the Board.

Timing - The earlier a concern is expressed, the easier it is to take action.

Evidence - Although the employee is not expected to prove the truth of an allegation, the employee should be able to demonstrate to the person contacted that the report is being made in good faith.

Procedure: 2. How the Report of Concern will be Handled

The action taken by the NAFC in response to a report of concern under this policy will depend on the nature of the concern. The Audit Committee of the NAFC Board of Directors shall receive information on each report of concern and follow-up information on actions taken.

Initial Inquiries - Initial inquiries will be made to determine whether an investigation is appropriate, and the form that it should take. Some concerns may be resolved without the need for investigation.

Further Information -The amount of contact between the complainant and the person or persons investigating the concern will depend on the nature of the issue and the clarity of information provided.

Further information may be sought from or provided to the person reporting the concern.