



FINANCIAL EXECUTIVES INTERNATIONAL TWIN CITIES CHAPTER (FEI-TC)

Whistleblower Policy

General

FEI Twin Cities Chapter requires directors, other volunteers, and consultants to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. Representatives of the organization must practice honesty and integrity in fulfilling their responsibilities and comply with all applicable laws and regulations.

The objectives of FEI Twin Cities Chapter Whistleblower Policy are to establish policies and procedures for:

- The submission of concerns regarding questionable accounting or audit matters by directors, officers, and other stakeholders of the organization, on a confidential and anonymous basis.
- The receipt, retention, and treatment of complaints received by the organization regarding accounting, internal controls, or auditing matters.
- The protection of directors, volunteers and other stakeholders reporting concerns from retaliatory actions.

Reporting Responsibility

Each director, volunteer and other stakeholder of FEI Twin Cities has an obligation to report in accordance with this Whistleblower Policy (a) questionable or improper accounting or auditing matters, and (b) violations and suspected violations of FEI Twin Cities (hereinafter collectively referred to as Concerns).

Authority of Executive Committee

All reported Concerns will be forwarded to the Executive Committee of FEI-TC in accordance with the procedures set forth herein. The Executive Committee shall be responsible for investigating, and making appropriate recommendations to the Board of Directors, with respect to all reported Concerns. In the event that the Concerns involve a member of the Executive Committee, that member shall not participate in the management of any investigation of such Concerns by the remaining members of the Executive Committee.

No Retaliation

This Whistleblower Policy is intended to encourage and enable directors, volunteers, and others to raise Concerns within the Organization for investigation and appropriate action. With this goal in mind, no director, volunteer, or others who, in good faith, reports a Concern shall be subject to retaliation or adverse consequences. Moreover, anyone who retaliates against someone who has reported a Concern in good faith is subject to discipline up to and including dismissal from their position with FEI-TC.

Reporting Concerns

Directors, Volunteers and Others

Directors, Volunteers and Others should submit Concerns in writing directly to the Chair of the Executive Committee. Contact information for the Chair of the Executive Committee may be obtained from any member of the Executive Committee. In the event that the Concerns involve the Chair of the Executive Committee, the Concerns may be reported to any other member of the Executive Committee.

Handling of Reported Violations

The Executive Committee shall address all reported Concerns. The Chair of the Executive Committee shall immediately notify the Chapter President of any such report. The Chair of the Executive Committee will notify the sender and acknowledge receipt of the Concern within five business days, if possible. It will not be possible to acknowledge receipt of anonymously submitted Concerns. In the event that the Concerns involve either the Chair of the Executive Committee, or another member of the Executive Committee, that person shall not participate in the management of any investigation of such Concerns by the remaining members of the Executive Committee.

All reports will be promptly investigated by the Executive Committee, and appropriate corrective action will be recommended to the Board of Directors, if warranted by the investigation. In addition, action taken must include a conclusion and/or follow-up with the complainant for complete closure of the Concern.

The Executive Committee has the authority to retain outside legal counsel, accountants, private investigators, or any other resource deemed necessary to conduct a full and complete investigation of the allegations.

Acting in Good Faith

Anyone reporting a Concern must act in good faith and have reasonable grounds for believing the information disclosed indicates an improper accounting or audit practice. The act of making allegations that prove to be unsubstantiated, and that prove to have been maliciously, recklessly,

or with the foreknowledge that the allegations are false, will be viewed as a serious disciplinary offense and may result in discipline, up to and including dismissal from the volunteer position. Such conduct may also give rise to other actions, including civil lawsuits.

Confidentiality

Report of Concerns, and investigations pertaining thereto, shall be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation.

Disclosure of reports of Concerns to individuals not involved in the investigation will be viewed as a serious disciplinary offense and may result in discipline, up to and including termination of employment. Such conduct may also give rise to other actions, including civil lawsuits.