

C. Whistleblower policy

The Friday Morning Music Club Inc. (hereinafter referred to as “FMMC”) encourages the reporting of improper activities within the organization and provides protection against retaliation in any form for the reporting of such activities.

Improper activities include violations of the organization’s ethical policies and activities on the part of any member of this organization that are illegal under established and applicable laws. This includes, but is not limited to, instances of fraud, theft, bribery, extortion, corruption, misuse of property for personal gain and the exercise of authority that is coercive, discriminatory, malicious, or involves gross misconduct.

Persons making a claim under the provisions of this policy must have a good faith belief that improper activities have occurred and be willing to provide, to the best of their ability, factual information supporting the claim(s).

Reporting procedures

1. Claims of improper action should be brought to the FMMC President. In the event that the claim involves the FMMC President it may be brought to the FMMC Treasurer or alternatively to any member of the FMMC Executive Committee of the FMMC Board of Governors (hereinafter referred to as “FMMC Executive Committee member”) if the FMMC Treasurer also is involved with the claim.
2. The FMMC President, or alternatively the FMMC Treasurer or FMMC Executive Committee member to whom the claim is brought, shall appoint an investigating officer who shall initiate an investigation of the claim(s) and shall control the scope and activities of the investigation.
3. Once a retaliation complaint is made, the investigative and hearing process shall be treated as a confidential matter by all parties until a final decision is rendered.
4. The FMMC Board of Governors (hereinafter referred to as the “FMMC Board”) as a whole, without any member who is involved in the investigation or part of the claim present, shall review the reports and evidence of the investigating officer, shall make findings of fact in such cases, and have authority to issue binding decisions in accordance with the provisions of this policy.
5. It is the FMMC Board’s expectation that all cases brought to its attention should be decided in a thorough but expedient manner. As a guideline, a term of no more than sixty (60) calendar days is the expectation for resolution of complaints.

Retaliation Claims

By adoption of this policy, the FMMC Board has extended protection from retaliation to any covered person making a claim and considers the practice of retaliation, or retribution

as a result of, or related to anyone making a claim of improper activity to be reprehensible. However, the FMMC Board also realizes, the making of such claim carries the risk of inflicting unintentional harm. Therefore, the FMMC Board has adopted the following procedural guidelines in an effort to protect the rights of all parties during the administration of this policy.

1. Claims of retaliation should be made to the FMMC President, or alternatively if the FMMC President is believed to be involved with the claim to the FMMC Treasurer, or to any FMMC Executive Committee member if the FMMC Treasurer is also believed to be connected to the claim. A sworn statement attesting that the written complaint is true, or believed to be true, under penalty of perjury must be submitted along with the claim of retaliation.
2. Upon receipt of a retaliation claim, the FMMC President or FMMC Treasurer or FMMC Executive Committee member receiving the claim shall appoint an investigating officer and cause the matter to be investigated, in the manner set forth above for claims of improper activity, and shall conduct a timely hearing on the complaint. As a guideline, the FMMC Board considers sixty (60) calendar days from the day of receipt of the claim to be timely.
3. Once a retaliation complaint is made, the investigative and hearing process shall be treated as a confidential matter by all parties until a final decision is rendered.
4. At the conclusion of the hearing phase, the FMMC Board shall enter a binding decision including appropriate relief, if any, for the complainant.

Annual Report

The organization shall make an annual report of actions taken in reference to administration of this policy. The report shall include a summary of all complaints filed, investigations and decisions made.

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