

	FMCA POLICIES AND PROCEDURES	INDEX NO. 2037	APPROVAL LEVEL EB
	SUBJECT Whistleblower	EFFECTIVE 11/05	SUPERSEDES
	SPECIAL DISTRIBUTION		

POLICY

Family Motor Coach Association (FMCA) and Family Motor Coaching, Inc’s. (FMC’s) Code of Conduct requires the FMCA Executive Board, FMC Board of Directors, committee members, directors, 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 Association, we must practice honesty and integrity in fulfilling our responsibilities and comply with all applicable laws and regulations.

PROCEDURE

Reporting Responsibility

It is the responsibility of the FMCA Executive Board, FMC Board of Directors, committee members, directors, and employees to comply with the Code of Conduct and to report violations or suspected violations in accordance with this Whistleblower Policy.

No Retaliation

No Board member, committee member, director or employee, who in good faith reports a violation of the Code of Conduct, shall suffer harassment, retaliation or adverse consequence. An individual who retaliates against someone who has reported a violation in good faith is subject to discipline up to and including termination of their position on the Board or committee or termination of employment. This Whistleblower Policy is intended to encourage and enable Board members, committee members, directors and employees to raise serious concerns within the Association prior to seeking resolution outside the Association.

Reporting Violations

The Code of Conduct addresses the Association’s open door policy and suggests that Board members, committee members, directors and employees share their questions, concerns, suggestions or complaints with someone who can address them properly. In most cases, an immediate supervisor is in the best position to address an area of concern. However, if one is not comfortable speaking with an immediate supervisor, or is not satisfied with their immediate supervisor’s response, they are encouraged to speak with someone in management whom they are comfortable in approaching. Supervisors and managers are required to report suspected violations of the Code of Conduct to the Association’s Compliance Officer, who has specific and exclusive responsibility to investigate all reported violations. For suspected fraud, or when one is not satisfied or uncomfortable with following the Association’s open door policy, individuals should contact the Association’s Compliance Officer directly.



SUBJECT

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Compliance Officer

The Association's Compliance Officer is responsible for investigating and resolving all reported complaints and allegations concerning violations of the Code of Conduct and, at his/her discretion, shall advise the Chief Executive Officer (CEO) and/or the audit committee. The Compliance Officer has direct access to the audit committee of the Board and is required to report to the audit committee at least annually on compliance activity. The Association's Compliance Officer is the chair of the audit committee.

Accounting and Auditing Matters

The audit committee of the Board shall address all reported concerns or complaints regarding corporate accounting practices, internal controls or auditing. The Compliance Officer 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 of Conduct must be acting in good faith and have reasonable grounds for believing the information disclosed indicates a violation of the Code of Conduct. 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 Compliance Officer 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.