

 <p>Policies</p>	<h2 style="margin: 0;">Fraudulent or Dishonest Conduct & Whistleblower Policy Statement</h2>	Date Created	4.18.2020
		Date Approved	4.18
		Last Update	4.18.20

Scope

The Bluebird Restoration Association of Wisconsin (BRAW) will investigate any possible fraudulent or dishonest use or misuse BRAW's resources or property by BRAW's BOD, Chairpersons, or Volunteers. Anyone found to have engaged in a fraudulent or dishonest conduct is subject to disciplinary action by BRAW.

All members of BRAW are encouraged to report possible fraudulent or dishonest conduct (*e.g., a whistleblower*). A BRAW member or volunteer should report his or her concerns to a BRAW Director. If for any reason a BRAW member or volunteer finds it difficult to report his or her concern to a manager or supervisor, the member or volunteer can report it directly to the President, or Vice-President.

BRAW members and/or volunteers are required to report suspected fraudulent or dishonest conduct to the President or VicePresident.

Definitions

Baseless Allegations:

Allegations made with reckless disregard for their truth or falsity. People making such allegations may be subject to institutional disciplinary action.

Fraudulent or Dishonest Conduct:

A deliberate act or failure to act with the intention of obtaining an unauthorized benefit. Examples of such conduct include, but are not limited to:

- o Forgery or alteration of documents
- o Unauthorized alteration or manipulation of computer files
- o Fraudulent financial reporting
- o Pursuit of a benefit or advantage in violation of ABC's conflict of interest policy
- o Misappropriation or misuse of BRAW resources, such as funds, supplies, or other assets
- o Authorizing or receiving compensation for goods not received or services not performed
- o Authorizing or receiving compensation for hours not worked

Whistleblower:

Any BRAW member, BRAW volunteer, or member of the public (must be 18 years old) who informs the President or Vice-President about an activity which that person believes to be fraudulent or dishonest.

Rights and Responsibilities

BRAW members and volunteers are encouraged to report suspected fraudulent or dishonest conduct to the President or Vice-President. Managers or supervisors are responsible for maintaining a system of management controls, which

Questions related to the interpretation of this policy should be directed to: Board of Director's President or Vice President.

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Rights and Responsibilities (cont.)

Reasonable care should be taken in dealing with suspected misconduct to avoid:

- o Baseless allegations
 - o Premature notice to a BRAW member or volunteer suspected of misconduct and/or disclosure of suspected misconduct to others not involved with the investigation
 - o Violations of a BRAW member's or volunteer's rights under law

Accordingly, a BRAW member or volunteer faced with a suspected misconduct:

- o Should not contact the person suspected or further investigate the matter or demand restitution
- o Should not discuss the case with anyone other than the President or Board of Directors.
- o Should direct all inquiries from any attorney retained by the suspected individual to the Board of Directors
- o Should direct all inquiries from the media to the President.

Whistleblower Protection

BRAW will protect whistleblowers as follows:

- BRAW will use best efforts to protect whistleblowers against retaliation, as described below. It cannot guarantee confidentiality, however, and there is no such thing as an "unofficial" or "off the record" report. BRAW will keep the whistleblower's identity confidential, unless: (1) the person agrees to be identified; (2) identification is necessary to allow BRAW or law enforcement officials to investigate or respond effectively to the report; (3) identification is required by law; or (4) the person accused of Fraud Policy violations is entitled to the information as a matter of legal right in disciplinary proceedings.
- BRAW members, BRAW volunteers, Board members or committee chairs may not retaliate against a whistleblower with the intent or effect of adversely affecting the terms or conditions of membership or volunteer service (*including but not limited to, threats of physical harm, loss of membership or volunteer status, and punitive work/volunteer assignments*).
 - o Whistleblowers who believe that they have been retaliated against may file a written complaint with the President or the Vice-President. A proven complaint of retaliation shall result in a proper remedy for the person harmed and the initiation of corrective action, up to and including loss of BRAW Membership, against the retaliating person.
 - o Whistleblowers must be cautious to avoid baseless allegations (as described earlier in the definitions section of this policy).

Contacts

Questions related to the interpretation of this policy should be directed to BRAW's President or Vice President.