

Medical Benevolence Foundation (MBF) Corporate Policy

Policy: Whistleblower Policy

Date: Date Established: April 21, 2012

Revised: March 1, 2013

Purpose: Medical Benevolence Foundation (MBF) expects all employees to conduct business transactions and practices in a highly ethical and legal manner. Whistle blowing occurs when an employee brings attention to any dangerous, illegal, or unethical practice engaged in by MBF or by MBF employees to management or other proper authorities. Employees bringing such practices to the attention of management or proper authorities are protected from actions of retaliation.

Policies:

1. Any employee having knowledge of any business dealings that are not within this standard or violate federal, state or local statutes should immediately report such activity to his or her supervisor. Or, if the employee's supervisor is thought to be involved in the prohibited activity, that employee should report the problem directly to the Executive Director.
2. Whenever a person of authority in MBF (i.e., officer, manager, or other person in charge) receives a complaint or other information indicating a possible violation of law and/or corporate policy, MBF will be responsible for conducting an internal investigation.
3. The reporting employee also has the option of reporting directly to the chair of the Personnel Committee or the Executive Committee for consideration at a specially convened or regularly scheduled committee/board meeting.
4. The Executive Director will have initial responsibility for inquiring into any and all complaints relating to employee misconduct. All complaints and the outcome of all investigations will be reported to the Board through the Personnel Committee and the Executive Committee.

The typical investigation will include the following steps:

- Interview all parties involved in the reporting, including but not limited to the complainant and accused (if possible). Secure all publicly available reports from police and/or other agencies concerning the reporting (if appropriate).
- Determine if there is a potential for risk occurrence. If there is a potential, take all measures appropriate to protect employees and property.
- Complete a written report of the findings and recommendations, including all relevant information.

5. MBF prohibits retaliation, including but not limited to making any threatening communication by verbal, written and/or electronic means, against any individual who reports and/or provides any information concerning unlawful practices and/or other violations of MBF policies, rules and standards of conduct. Any employee found engaging in retaliation will be subject to disciplinary action up to and including termination.
6. MBF will not discharge or discriminate against any employee with respect to compensation, terms, conditions, or privileges of employment because the employee (or any person acting pursuant to the request of the employee) reports, discloses, testifies, or otherwise informs any federal or state banking agency, securities regulator, tax regulator, the U.S. Attorney General, any appropriate local, state or federal government authority, or a member of MBF management of a possible violation of any law or regulation by MBF or any Trustee/Director or employee of MBF.
7. MBF shall ensure that allegations made by an employee, client/potential client or Trustee/Director of misconduct or other irregularities on the part of anyone associated with MBF are dealt with impartially, respecting the rights of the involved parties for confidentiality and disclosure.

Approval



MBF Board President

4/13/2013
Date



MBF Executive Director

4/13/2013
Date