Port Washington Fire Department

Policy and Procedure Manual

Whistleblower Policy

# Whistleblower Policy of the

# Port Washington Fire Department Inc.

## Part I: General

Port Washington Fire Department ("The Organization") Code of Ethics and Conduct ("the Code") requires officers and members to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. As members and representatives of the Organization, they must practice honesty and integrity in fulfilling their responsibilities and comply with all applicable laws and regulations.

## Part II: Reporting Responsibility

It is the responsibility of all officers and members to comply with the Code and to report violations or suspected violations in accordance with the Whistleblower Policy.

## Part III: No Retaliation

No officer or member (the individual) who in good faith reports a violation of the Code shall suffer harassment, retaliation or adverse membership consequence. Anyone who retaliates against someone who has reported a violation in good faith is subject to discipline up to and including termination of membership. The Whistleblower Policy is intended to encourage and enable individuals to raise serious concerns within the Organization prior to seeking resolution outside the Organization.

## Part IV: Reporting Violations

The Code addresses the Organization's open door policy and suggests that individuals share their questions, concerns, suggestions or complaints with someone who can address them properly. In most cases, an individual's highest ranking officer is in the best position to address an area of concern. However, if the individual is not comfortable speaking with his or her highest ranking officer or is not satisfied with his or her highest ranking officer's response, the individual is encouraged to speak with one of the other officers with whom the individual is comfortable in approaching. Officers are required to report suspected violations of the Code of Conduct to the Organization's Compliance Officer, who has specific and exclusive responsibility to investigate all reported violations. For suspected fraud, or when they are not comfortable with following the Organization's open door policy, individuals should contact the Organization's Compliance Officer directly.

## Part V: Compliance Officer

The Organization's Compliance Officer (Chairperson of the Board)is responsible for investigating and resolving all reported complaints and allegations concerning violations of the Code and, at his or her discretion, shall advise the audit committee. The Compliance Officer has direct access to the audit committee. The Organization's Compliance Officer is the chair of the audit committee.

**Part VI: Accounting and Auditing Matters**

The Board of Directors 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.

**Part VII: Acting in Good Faith**

Anyone filing a complaint concerning a violation or suspected violation of the Code must be acting in good faith and have reasonable grounds for believing the information disclosed indicates a violation of the Code. Any allegations that prove not to be substantiated and which prove to have been maliciously or knowingly to be false will be viewed as a serious disciplinary offense.

**Part VIII: 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.

**Part IX: 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.