

REPORTING FRAUDULENT OR DISHONEST BEHAVIOR

BIG BROTHERS BIG SISTERS SOUTHEASTERN PA seeks to enhance the value of our organization over the long term in the interests of our Bigs, Littles and society as a whole. That objective is advanced by paying close attention to our constituents' needs, by teamwork and by a focus on productivity and efficiency in our operations. It is also advanced by paying close attention to legal and socially responsible issues, and to conduct that reflects the highest ethical values. As such, Big Brothers Big Sisters Southeastern PA requires that all staff, board members and volunteers act with honesty, integrity and openness in all their dealings with or for the organization.

Staff, board members, consultants and volunteers are encouraged to report suspected fraudulent or dishonest conduct, in particular, in cases where the rights of third parties may be affected, when damage to BBBSSEPA or any of its' constituents appears imminent, and when legal duties are not clear. Anyone may report fraudulent or dishonest behavior, either directly or anonymously if the reporter wishes, to any of the following Agency representatives (whomever the reporter is most comfortable with): the Chair of Big Brothers Big Sisters SEPA's Board of Directors, any Board Finance Committee member, the CEO, a Leadership Team member or a Human Resources representative. Reasonable care should be taken when considering filing a report of suspected misconduct in order to avoid baseless allegations.

All reports will be investigated and appropriate action will be taken, which may include handling by independent persons such as auditors and/or attorneys. Anyone who reports suspected misconduct is discouraged from continuing to take follow up steps on their own before Big Brothers Big Sisters SEPA has the opportunity to conduct a complete investigation.

Reports resulting in substantiated allegations will result in disciplinary action including possible termination of employment, dismissal from the Board, termination of volunteer services or possible civil or criminal prosecution if warranted.

BIG BROTHERS BIG SISTERS SEPA will protect anyone reporting fraudulent or dishonest behavior as follows:

- BIG BROTHERS BIG SISTERS SEPA will use its best efforts to protect the reporting party against retaliation. Complaints will be handled with sensitivity, discretion and confidentiality; and with due consideration of the circumstances and the law. We will take all reasonable steps to keep confidential the identity of anyone reporting a possible violation. Generally this means that complaints will only be shared with those who have a need to know so that an effective investigation can be conducted.
- Employees, consultants and volunteers may not retaliate against anyone reporting fraudulent or dishonest behavior to management about an activity which that person reports in good faith to be fraudulent or dishonest. Anyone who believes they have been retaliated against for reporting fraudulent or dishonest behavior may file a written complaint with those noted above. Any complaint of retaliation will be promptly investigated and appropriate corrective measures taken if allegations of retaliation are substantiated. This protection from retaliation is not intended to prohibit supervisors from taking action, including disciplinary action, in the usual scope of their duties and based on valid performance-related factors.