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#### Fair Factories Clearinghouse

#### Whistleblower Policy

**General**

The Fair Factories Clearinghouse (FFC) requires directors, other volunteers, and employees to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. Employees and representatives of the organization must practice honesty and integrity in fulfilling their responsibilities and comply with all applicable laws, regulations and internal controls established by the organization.

The objectives of the FFC Whistleblower Policy are to establish policies and procedures for:

* The submission of concerns regarding questionable accounting or audit matters by employees, directors, officers, and other stakeholders of the organization, on a confidential and anonymous basis.
* The receipt, retention, and treatment of complaints received by the organization regarding accounting, internal controls, or auditing matters.
* The protection of directors, volunteers and employees reporting concerns from retaliatory actions.

**Reporting Responsibility**

Each director, volunteer, and employee of FFC has an obligation to report concerns in accordance with this Whistleblower Policy.

**Authority of the Board of Directors**

All reported concerns will be forwarded to the Board in accordance with the procedures set forth herein. The Board shall be responsible for investigating all reported concerns and taking appropriate actions.

**No Retaliation**

This Whistleblower Policy is intended to encourage and enable directors, volunteers, and employees to raise concerns within the Organization for investigation and appropriate action. With this goal in mind, no director, volunteer, or employee who, in good faith, reports a concern shall be subject to retaliation or, in the case of an employee, adverse employment consequences. Moreover, a volunteer or employee who retaliates against someone who has reported a concern in good faith is subject to discipline up to and including dismissal from the volunteer position or termination of employment.

#### Reporting Concerns

**Employees**

Employees should first discuss their Concern with their immediate supervisor. If, after speaking with his or her supervisor, the individual continues to have reasonable grounds to believe the Concern is valid, the individual should report the Concern to the Executive Director. In addition, if the individual is uncomfortable speaking with his or her supervisor, or the supervisor is a subject of the Concern, the individual should report his or her Concern directly to another member of management.

The Concern should be reduced to writing and forwarded at the earliest opportunity to the Chair of the Board. Contact information for the Chair of the Board may be obtained from the Executive Director, if the Executive Director is the subject of the concern, then directly from another member of the management team. Concerns may also be submitted anonymously. Such anonymous Concerns should be in writing and sent directly to the Chair of the Board.

**Directors and Other Volunteers**

Directors and other volunteers should submit Concerns in writing directly to the Chair of the Board.

**Contact Information for the Chair of the Board**

The Chairman of the Board can be reached via email at ffcboard@fairfactories.org or via FFC’s mailing address: 10 Muzzey Street, Lexington, MA 02421. If sending to the mail address please be sure to mark the envelop “Chairman of the Board, Fair Factories Clearinghouse”.

**Handling of Reported Violations**

The Board of Directors shall address all reported Concerns. The Chair of the Board will notify the sender and acknowledge receipt of the Concern within five business days, if possible. It will not be possible to acknowledge receipt of anonymously submitted Concerns.

All reports will be promptly investigated by the Board, and appropriate corrective action will be recommended, if warranted by the investigation. In addition, action taken must include a conclusion and/or follow-up with the complainant, when not anonymous, for complete closure of the Concern.

The Board has the authority to retain outside legal counsel, accountants, private investigators, or any other resource deemed necessary to conduct a full and complete investigation of the allegations.

**Acting in Good Faith**

Anyone reporting a Concern must act in good faith and have reasonable grounds for believing the information disclosed indicates an improper accounting or auditing practice, or a violation of FFC policy. The act of making allegations that prove to be unsubstantiated, and that prove to have been made maliciously, recklessly, or with the foreknowledge that the allegations are false, will be viewed as a serious disciplinary offense and may result in discipline, up to and including dismissal from the volunteer position or termination of employment. Such conduct may also give rise to other actions, including civil lawsuits.

**Confidentiality**

Reports of Concerns, and investigations pertaining thereto, shall be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation.

Disclosure of reports of Concerns to individuals not involved in the investigation will be viewed as a serious disciplinary offense and may result in discipline, up to and including termination of employment. Such conduct may also give rise to other actions, including civil lawsuits.

*Adopted March 1, 2016*