

LIONS OF MICHIGAN MD 11, INC.

WHISTLEBLOWER POLICY

In keeping with the policy of maintaining the highest standards of conduct and ethics, the Lions of Michigan MD 11, Inc. will investigate any suspected fraudulent or dishonest use or misuse of Lions of Michigan's resources or property by employees, District Governors, committee members, or volunteers.

Employees, District Governors, committee members, and volunteers are encouraged to report suspected fraudulent or dishonest conduct (i.e., to act as "whistleblower"), pursuant to the procedures set forth below.

Reporting

A person's concerns about possible fraudulent or dishonest use or misuse of resources or property should be reported to the Executive Director or, if suspected by a volunteer, to the committee chairperson supporting the volunteer's work. If, for any reason, a person finds it difficult to report his or her concerns to the Executive Director or the committee chairperson supporting the volunteer's work, the person may report the concerns directly to the Council Chairperson. Alternately, to facilitate reporting of suspected violations where the reporter wishes to remain anonymous, a written statement may be submitted to one of the individuals listed above.

Definitions

Baseless Allegations

Allegations made with reckless disregard for their truth or falsity. Individuals making such allegations may be subject to disciplinary action by Lions of Michigan MD 11, Inc., and/or legal claims by individuals accused of such conduct.

Fraudulent or Dishonest Conduct

A deliberate act or failure to act with the intention of obtaining an unauthorized benefit. Examples of such conduct include

- Forgery or alteration of documents
- Unauthorized alteration or manipulation of computer files
- Fraudulent financial reporting
- Pursuit of a benefit or advantage in violation of Lions of Michigan MD 11, Inc.'s Conflict-of-Interest Policy
- Misappropriation or misuse of Lions of Michigan MD 11, Inc. resources, such as funds, supplies, or other assets
- Authorizing or receiving compensation for goods not received or services not

- performed
- Authorizing or receiving compensation for hours not worked

Whistleblower

An employee, District Governor, committee member, consultant or volunteer who informs the Executive Director, Council Chair or a committee chairperson about an activity relating to Lions of Michigan MD 11, Inc. which that person believes to be fraudulent or dishonest.

Rights and Responsibilities

Supervisors

Supervisors, District Governors and committee chairpersons are required to report suspected fraudulent or dishonest conduct to the Executive Director or as otherwise directed in this policy. Reasonable care should be taken in dealing with suspected misconduct to avoid

- Baseless allegations
- Premature notice to persons suspected of misconduct and/or disclosure of suspected misconduct to others not involved with the investigation
- Violations of a person's rights under law
- Due to the important yet sensitive nature of the suspected violations, effective professional follow-up is critical. Supervisors, while appropriately concerned about "getting to the bottom" of such issues, should not in any circumstances perform any investigative or other follow-up steps on their own. Accordingly, a supervisor who becomes aware of suspected misconduct
- Should not contact the person suspected to further investigate the matter or demand restitution
- Should not discuss the case with attorneys, the media, or anyone other than the chief executive
- Should not report the case to an authorized law enforcement officer without first discussing the case with the chief executive

Investigation

All relevant matters, including suspected but unproved matters, will be reviewed and analyzed, with documentation of the receipt, retention, investigation, and treatment of the complaint. Appropriate corrective action will

be taken, if necessary, and findings will be communicated to the reporting person and his or her supervisor. Investigations may warrant investigation by independent persons such as auditors and/or attorneys.

Whistleblower Protection

Lions of Michigan MD 11, Inc. will protect whistleblowers as defined below:

- Lions of Michigan MD 11, Inc. will use its best efforts to protect whistleblowers against retaliation. Whistleblower complaints will be handled with sensitivity, discretion, and confidentiality to the extent allowed by the circumstances and the law. Generally, this means that whistleblower complaints will only be shared with those who have a need to know so that Lions of Michigan MD 11, Inc. can conduct an effective investigation, determine what action to take based on the results of any such investigation, and in appropriate cases, with law enforcement personnel. (Should disciplinary or legal action be taken against a person or persons as a result of a whistleblower complaint, such persons may also have the right to know the identity of the whistleblower.)
- Employees, consultants, and volunteers of Lions of Michigan MD 11, Inc. may not retaliate against a whistleblower for informing management about an activity which that person believes to be fraudulent or dishonest with the intent or effect of adversely affecting the terms or conditions of the whistleblower's employment, including but not limited to, threats of physical harm, loss of job, punitive work assignments, or impact on salary or fees. Whistleblowers who believe that they have been retaliated against may file a written complaint with the Executive Director or as otherwise directed in this policy. 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 the supervisor from taking action, including disciplinary action, in the usual scope of their duties and based on valid performance-related factors.
- Whistleblowers must be cautious to avoid baseless allegations (as described earlier in the definitions section of this policy).