

## Whistleblower Policy, AIDS Service Foundation of Greater Kansas City

### Purpose and scope

The AIDS Service Foundation of Greater Kansas City (ASF) requires board members and employees to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. As employees and representatives of the ASF we must practice honesty and integrity in fulfilling our responsibilities and comply with all applicable laws and regulations. ASF is committed to fostering a culture of transparency, ethical conduct, and compliance with all applicable laws. This Whistleblower Policy provides guidelines for reporting concerns related to fraud, unethical behavior, financial misconduct, conflicts of interest, or other violations of our policies or legal obligations by any employee, board member, volunteer, vendor, contractor, grantee, or other individual engaged with the foundation. This policy is intended to ensure that individuals can report concerns without fear of retaliation and that all reports will be taken seriously, investigated appropriately, and addressed in a fair and timely manner.

### Policy

A whistleblower as defined by this policy is any individual or entity who reports, in good faith, a suspected violation of ASF's policies or any federal, state, or local law applicable to the foundation's operations, funding, or business relationships.

Examples of reportable misconduct under this policy include:

- **Fraud or financial misconduct:** Theft, bribery, embezzlement, falsification of financial records, improper use of funds, or other fraudulent activities.
- **Ethical violations:** Breaches of the foundation's ethics policies, conflicts of interest, or misuse of donor funds.
- **Employment law violations:** Discrimination, harassment, retaliation, or other unlawful workplace practices.
- **Misuse of property or information:** Unauthorized use of organizational assets, improper disclosure of confidential or proprietary information, or destruction of important records.

### Reporting Responsibility

This Whistleblower Policy is intended to encourage and enable employees and others to raise serious concerns internally so that ASF can address and correct inappropriate conduct and actions. It is the responsibility of all board members, officers, employees and volunteers to report concerns about violations of ASF's code of ethics or suspected violations of law or regulations that govern ASF's operations. A whistleblower is not responsible for investigating misconduct but should report concerns to the designated reporting channels. Reports should be made in good faith; knowingly making a false accusation may result in disciplinary action.

### No Retaliation

It is contrary to the values of ASF for anyone to retaliate against any board member, employee, or volunteer who in good faith reports an ethics violation, or a suspected violation of law, such as a complaint of discrimination, or suspected fraud, or suspected violation of any regulation governing the operations of ASF. An employee who retaliates against someone who has reported a violation in good faith is subject to discipline up to and including termination of employment.

**Reporting Procedure**

ASF has an open-door policy and suggests that employees, board members, and volunteers share their questions, concerns, suggestions or complaints with the Board President (president@asfkc.org). If you are not comfortable speaking with the Board President, or you are not satisfied with the Board President's response, you are encouraged to speak with an ASF employee or board member. Board members and employees are required to report complaints or concerns about suspected ethical and legal violations in writing to the ASF's Board President [or designated employee or board member], who has the responsibility to investigate all reported complaints. Board members and employees with concerns or complaints may also submit their concerns in writing directly to the organization's Board President.

**Compliance**

The ASF's Board President is responsible for ensuring that all complaints about unethical or illegal conduct are investigated and resolved. The Board President will advise the Board of Directors of all complaints and their resolution and will report at least annually to the Treasurer on compliance activity relating to accounting or alleged financial improprieties.

**Accounting and Auditing Matters**

The ASF's Board President shall immediately notify the Treasurer of any concerns or complaint regarding corporate accounting practices, internal controls or auditing and work with the committee until the matter is resolved.

**Acting in Good Faith**

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

**Confidentiality**

Violations or suspected violations may be submitted on a confidential basis by the complainant. Reports of violations or suspected violations will be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation, though disclosure may be required for a thorough investigation or legal compliance.

**Handling of Reported Violations**

The ASF's Board President will notify the person who submitted a complaint and acknowledge receipt of the reported violation or suspected violation. All reports will be promptly investigated, and appropriate corrective action will be taken if warranted by the investigation.

**Adopted on:** February 17, 2025

**Reviewed by:** Board of Directors, AIDS Service Foundation of Greater Kansas City