

PREVENT BLINDNESS POLICIES & PROCEDURES

Policy Name:	WhistleBlower Protection Policy
Approved by Committee:	Finance & Administration Committee, January 11, 2008
Approved by Board:	Board of Directors, January 12, 2008
Updated:	Approved by Board of Directors, March 5, 2016

WHISTLEBLOWER PROTECTION POLICY

POLICY ON REPORTING OF FINANCIAL, AUDITING OR GOVERNANCE IMPROPRIETIES

Prevent Blindness is committed to facilitating open and honest communications relevant to its governance, finances, and compliance with all applicable laws and regulations. It is important that Prevent Blindness be apprised about unlawful or improper behavior including, but not limited to, any of the following conduct:

- theft;
- financial reporting that is intentionally misleading;
- improper or undocumented financial transactions;
- improper destruction of records;
- improper use of assets;
- violations of Prevent Blindness's conflict-of-interest policy; and
- any other improper occurrence regarding cash, financial procedures, or reporting.

We request the assistance of every employee who has a reasonable belief or suspicion about any improper transaction. Prevent Blindness values this input, and each employee should feel free to raise issues of concern, in good faith, without fear of retaliation. Employees will not be disciplined, demoted, lose their jobs, or be retaliated against for asking questions or voicing concerns about conduct of this sort. At the same time, the NHC expects all employees to take this policy seriously, to use it in good faith, and to use it when necessary and in a judicious manner. Reports that are not made in good faith, or otherwise are intended to harass or annoy an employee, may result in disciplinary action, including termination.

Making a Report

We encourage any employee who has a concern regarding an action concerning Prevent Blindness's governance, finances, or compliance with all applicable laws and regulations to raise the concern with a supervisor, the president, or the director of finance and administration.

If for any reason the employee does not believe these channels of communication are adequate, the concern should be reported immediately to either the chair of the board or the chair of the Audit Committee. Anonymous reports will be accepted, and all reports will be handled on a confidential basis. The contact information for the board chair and the chair of the Audit Committee appears below.



Mark the envelope: "TO BE OPENED BY ADDRESSEE ONLY. PERSONAL AND CONFIDENTIAL."

The board chair or the chair of the Audit Committee will coordinate the investigation and Prevent Blindness will take appropriate action as it deems justifiable by the circumstances.

This policy is to be posted in the office of Prevent Blindness, included in the personnel manual, and communicated to all new staff as part of their orientation. In addition, every year, after the annual election of the board chair and after the chair of the Audit Committee has been selected, the director, finance and administration, will have the responsibility of updating the contact information for both of those individuals and then sending the policy with the updated contact information to all staff.

CONTACT INFORMATION (as of 5/2/17):

Board Chair:

Richard Sanchez
President & CEO
Visibility Management
13575 58th Street North, Suite 124
Clearwater, FL 33760
(727)641-3659
Richard@visibilitymgmt.com

Audit Committee Chair:

Steve Corman
179 Sea Trace Lane
Newport, NC 28570
(252)726-7428
H2OCorman@gmail.com