

## **EMS FDNY Help Fund Whistleblower Policy**

The **EMS FDNY HELP FUND** (the “Fund”) requires directors, officers 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 Fund, we must practice honesty and integrity in fulfilling our responsibilities and comply with all applicable laws and regulations.

### **Reporting Responsibility**

This Whistleblower Policy is intended to encourage and enable employees and others to raise serious concerns internally so that the Fund 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 the Fund’s code of ethics or suspected violations of law or regulations that govern the Fund’s operations.

### **No Retaliation**

It is contrary to the values of the Fund for anyone to retaliate against any board member, officer, 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 the Fund. Any director who retaliates against someone who has reported a violation in good faith is subject to discipline up to and including removal from the organization.

### **Reporting Procedure**

The Fund has an open-door policy and suggests that anyone share their questions, concerns, suggestions or complaints with the Board of Directors. If you are not comfortable speaking with a specific director or you are not satisfied with the director’s response, you are encouraged to speak with one of the Designated Directors. Directors are required to report complaints or concerns about suspected ethical and legal violations in writing to the Fund’s Designated Directors, who have the responsibility to investigate all reported complaints. Anyone with concerns or complaints may also submit their concerns in writing directly to a Designated Director.

### **Designated Directors**

The Fund’s Designated Directors are responsible for ensuring that all complaints about unethical or illegal conduct are investigated and resolved. The Designated Directors will

advise the Executive Director and/or the Board of Directors of all complaints and their resolution and will report at least annually to the Board of Directors and Audit Committee on compliance activity relating to accounting or alleged financial improprieties.

### **Accounting and Auditing Matters**

The Fund's Designated Directors shall immediately notify the Audit Committee and Governance Committee 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 violates a specific item of the Fund's policies or the laws of the State of New York. 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.

### **Handling of Reported Violations**

The Fund's Designated Directors 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.

The Designated Directors for the Fund are:

1. James Hamilton – [james.hamilton@emsfdnyhelpfund.com](mailto:james.hamilton@emsfdnyhelpfund.com) / (646) 406-5804
2. Buffy Redsecker – [buffy@pobox.com](mailto:buffy@pobox.com) / (415) 225-3291 (text first)
3. Indre Saviciute – [indre.saviciute@emsfdnyhelpfund.com](mailto:indre.saviciute@emsfdnyhelpfund.com) / (646) 425-5965