

THE DOMESTIC AND FOREIGN MISSIONARY SOCIETY (“THE SOCIETY”)

WHISTLEBLOWING POLICY

The Society is committed to doing business in a workplace conducive to open discussion of The Society’s business practices, in an environment of honesty and integrity. Therefore, The Society will not tolerate any illegal, dishonest and/or fraudulent activities or violations of corporate policy by any of The Society’s employees, directors, officers, consultants, agents, vendors, contractors, volunteers and any other outside third parties.

To that end, employees, directors, officers, consultants, agents, vendors, contractors, volunteers and any other outside third parties are required to promptly report any allegations involving possible illegal activities, dishonest activities and/or fraud or violations of corporate policy in matters relating to The Society to: The Secretary and Executive Officer of the General Convention, at ext. 5184/212-922-5184, who shall be designated The Society’s “**Compliance Officer**” and who shall report to the Executive Council through its Joint Audit Committee of The Society/Executive Council; or **EthicsPoint** (a firm that specializes in compliance and risk management), by phone at 866-ETHICS-P/866-384-4277 or online through [EthicsPoint](#).

Reports may be submitted anonymously. For employees of The Society, prior to making a report/complaint, employees are encouraged, but *not required*, to discuss issues and concerns pertaining to illegal, dishonest and/or fraudulent activities or violations of corporate policy with their department head, supervisor, manager, team leader and/or any member of The Society’s Executive Oversight Group. All reports, whether written or verbal, should contain sufficient information to substantiate the concern being reported to allow appropriate investigation to begin.

For the purposes of this policy, “fraud” is defined as the deliberate practice or deception in order to receive unfair or unlawful gain. Examples of illegal, dishonest and/or fraudulent activities or violations of corporate policy include, but are not limited to:

1. Forgery, falsification or alteration of documents (for example: receipts submitted for expense account reimbursement, cash receipts, checks, vendor agreements, purchase orders, other financial documents, electronic files);
2. Misapplication and/or misappropriation of The Society’s funds, supplies, property or other assets;
3. Impropriety in the handling or reporting of money or financial transactions relating to The Society;
4. Profiteering as a result of insider knowledge of The Society’s plans and activities;
5. Unauthorized disclosure of The Society’s confidential and proprietary information to outside parties;

6. Employees or their Relatives¹ receiving any gratuities, gifts of money, property or service, discounts or other like favors which exceed courtesies customarily accepted as business practices, which might place, or be construed as placing, an employee directors, officers, consultants, agents, vendors, contractors, volunteers and any other outside third parties under any obligation to act on behalf of The Society;

7. Destruction, removal, or inappropriate use of The Society's records, furniture, fixtures and equipment;

8. Actions related to concealing or perpetrating the above-mentioned activities; and/or

9. Any alleged violation of law.

The Society may report cases of alleged illegal, dishonest and/or fraudulent activities or violations of corporate policy to the appropriate law enforcement authorities. The Society will cooperate with law enforcement authorities in any investigation and/or prosecution of such cases.

The Society prohibits retaliation against employees for reporting a complaint under this policy or for cooperating in an investigation regarding a matter reportable under this policy.

Any employee who raises concerns without a legitimate basis may be subject to disciplinary action, up to and including termination from employment. If any other individual, business or organization raises concerns without good cause The Society may terminate its business or other relationship with such individual or organization.

¹ For purposes of this Policy: the term "Relatives" is defined as an individual's: spouse, ancestors, brothers and sisters (whole or half-blood), children (natural or adopted), grandchildren, great-grandchildren, and spouses of brothers, sisters, children, grandchildren and great-grandchildren or a domestic partner.