

BOMA Orlando Whistleblower Policy

General

The Building Owners and Managers Association of Orlando Code of Ethics, policies and practices require directors, officers and members to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. Members and representatives of the organization are expected to practice honesty and integrity in fulfilling their responsibilities and comply with all applicable laws and regulations.

Reporting Responsibility

It is the responsibility of all directors, officers and members to comply with all codes and policies and to report violations or suspected violations in accordance with this Whistleblower Policy.

No Retaliation

No director, officer or member who in good faith reports a violation shall suffer harassment, retaliation or adverse employment consequence. An member who retaliates against someone who has reported a violation in good faith is subject to discipline up to and including termination of employment. This Whistleblower Policy is intended to encourage and enable employees and others to raise serious concerns within the organization prior to seeking resolution outside the organization.

Reporting Violations

BOMA Orlando has an open door policy and suggests that members share their questions, concerns, suggestions or complaints with someone who can address them properly. In most cases, the Executive Director is in the best position to address an area of concern. However, if an member is not comfortable speaking with the Executive Director or is not satisfied with the response received, they are encouraged to speak with someone in a leadership position whom they are comfortable in approaching. The Executive Director is required to report suspected violations of codes and policies to the Organization's Compliance Officer (BOMA Orlando's Executive Committee), who has specific and exclusive responsibility to investigate all reported violations. For suspected fraud, or when someone is not satisfied or uncomfortable with following the Organization's open door policy, individuals should contact the Organization's Compliance Officer (BOMA Orlando's Executive Committee) directly.

Compliance Officer (which shall be BOMA Orlando's Executive Committee)

The Executive Committee of the Association shall be the Compliance Officer for BOMA Orlando. The Compliance Officer is responsible for investigating and resolving all reported complaints and allegations concerning violations of the codes and policies and, at his/her discretion, shall advise the Executive Director and/or the audit committee (BOMA Orlando's Finance Committee). The Compliance Officer has direct access to the audit committee of the board of directors and is required to report to the audit committee at least annually on compliance activity. The Organization's Compliance Officer shall sit on the audit committee.

Accounting and Auditing Matters (which shall be BOMA Orlando's Finance Committee)

The audit committee of the board of directors shall address all reported concerns or complaints regarding corporate accounting practices, internal controls or auditing. The Compliance Officer shall immediately notify the audit committee of any such complaint and work with the committee until the matter is resolved.

Acting in Good Faith

Anyone filing a complaint concerning a violation or suspected violation of codes or policies 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 or may be submitted anonymously. 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 Compliance Officer will notify the sender and acknowledge receipt of the reported violation or suspected violation within five business days. All reports will be promptly investigated and appropriate corrective action will be taken if warranted by the investigation.

Portions of this document are taken from the Sample Whistle Blower

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