



FLORIDA APARTMENT ASSOCIATION WHISTLEBLOWER POLICY

REVISED
12/02/08

General

FAA's Code of Ethics and Conduct ("Code") requires directors and officers to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. As representatives of the organization, we must practice honesty and integrity in fulfilling our responsibilities and comply with all applicable laws and regulations.

Reporting Responsibility

It is the responsibility of all directors and officers to comply with the Code 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 of the Code shall suffer harassment, retaliation, or adverse consequence. A FAA representative who retaliates against someone who has reported a violation in good faith is subject to discipline up to and including dismissal from their position on the board. This Whistleblower Policy is intended to encourage and enable members and others to raise serious concerns within the organization prior to seeking resolution outside the organization.

Reporting Violations

This Code addresses the organization's open-door policy and suggests that members share their questions, concerns, suggestions, or complaints with someone who can address them properly. In most cases, a board member is in the best position to address an area of concern. However, if you are not comfortable speaking with a board member or you are not satisfied with a board member's response, you are encouraged to speak with anyone in management of the organization who you are comfortable approaching. Managers are required to report suspected violations of the Code of Conduct to the organization's governing board of directors as a whole, which has specific and exclusive responsibility to investigate all reported violations. For suspected fraud, or when you are not satisfied or uncomfortable with following the organization's open-door policy, individuals should contact the organization's board of directors as a whole.

Board of Directors

The organization's Board of Directors is responsible for investigating and resolving all reported complaints and allegations concerning violations of the Code and, at their discretion, shall take appropriate action.

Accounting and Auditing Matters

The budget and finance committee of the board shall address all reported concerns or complaints regarding corporate accounting practices, internal controls, or auditing. The Board of Directors shall immediately notify the budget and finance 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 the Code must be acting in good faith and have reasonable grounds for believing the information disclosed indicates a violation of the Code. 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 Board of Directors will notify the sender and acknowledge receipt of the reported violation or suspected violation within 10 business days. All reports will be promptly investigated and appropriate corrective action will be taken if warranted by the investigation.

President, FAA Board of Directors

FAA Management Representative

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