

May 2019

### Purpose

The purpose of this policy is to provide all employees, contractors, board members and other volunteers with guidelines for the reporting of unethical or illegal behavior or conduct that violates any Filter Photo, NFP ("Filter Photo") policy by Filter Photo staff, board members, contractors or volunteers.

### Policy

Filter Photo is committed to lawful, ethical, and financially proper behavior in all of its activities and requires its employees, contractors, board members and other volunteers to conduct themselves in a manner that complies with all applicable laws and regulations, Filter Photo policies and the highest ethical standards.

### Reporting Violations

Any time an employee, contractor, board member or other volunteer has a concern regarding the ethical or financial propriety and/or legality of any action contemplated to be taken or that has been taken by Filter Photo or any other employee, contractor, board member or volunteer, or believes that an action needs to be taken for Filter Photo to be in compliance with law, Filter Photo policy or appropriate ethical standards, that person should immediately contact the Executive Director or the President, Secretary or Treasurer of Filter Photo's Board of Directors. Anyone reporting a violation must act in good faith and have credible information for believing that a violation has occurred.

### Handling of Reported Violations

The Executive Committee of the Board shall address all reports of alleged illegal or unethical conduct. The Executive Director or any other Filter Photo Officer who receives a report alleging illegal, financially improper, or unethical conduct and/or a violation of any Filter Photo policy by a Filter Photo employee or other representative shall notify the Executive Committee of the Filter Photo Board whenever such a report is received.

All reports will be promptly investigated by the Executive Committee, but any member of the Executive Committee who is the subject of such a report shall not participate in any way in the investigation except to answer questions or requests for information from the Executive Committee. Every effort will be made to investigate a report of alleged misconduct as quickly and discreetly as possible. Because of the need to investigate the report, correct a problem or prevent future problems, Filter Photo cannot promise complete confidentiality.

The Executive Committee has the authority to retain outside legal counsel, accountants, private investigators or any other resource deemed necessary to conduct a full and complete investigation of the allegations.

If warranted by the investigation, the Executive Committee shall recommend appropriate corrective action to the Board of Directors. The Executive Committee shall reply to the complainant as appropriate.

### No Retaliation

This whistle-blower policy is intended to encourage and enable directors, volunteers, contractors, and employees to raise concerns within the organization for investigation and appropriate action. No employee, board member, contractor or other volunteer will be retaliated against, discriminated against, threatened or discharged or otherwise disciplined for reporting in good faith what he/she in good faith believes to be unethical or illegal conduct.