

**AMERICAN FOUNDATION FOR SUICIDE PREVENTION**  
**WHISTLEBLOWER POLICY**

*(Approved by board of directors 2013)*

The American Foundation for Suicide Prevention (“AFSP”) requires board members, officers and employees to observe high standards of business and personal ethics in the conduct of their duties and to comply with all applicable laws and regulations. As employees and representatives of AFSP, we must practice honesty and integrity in fulfilling our responsibilities. The matters which should be reported under this policy include accounting or auditing irregularities, fraud, theft, embezzlement, bribery, kickbacks, misuse of assets, violations of AFSP’s conflict of interest policy, and similar issues, concerns or violations (all such matters hereinafter called “violations”). This policy is not a vehicle for reporting violations of AFSP’s applicable human resources policies, problems with co-workers or managers, or for reporting issues related to alleged employment discrimination or sexual or any other form of unlawful harassment, all of which should be dealt with in accordance with the relevant policies and procedures of AFSP.

**Reporting Responsibility**

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

**No Retaliation**

It is contrary to the values of AFSP 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 AFSP. An employee who retaliates against someone who has reported a violation in good faith is subject to discipline up to and including termination of employment.

**Reporting Procedure**

AFSP has an open door policy and suggests that employees share their questions, concerns, suggestions or complaints with their supervisor. If you are not comfortable speaking with your supervisor or you are not satisfied with your supervisor’s response, you are encouraged to speak with the Executive Director. Supervisors and managers are required to report complaints or concerns about suspected ethical and legal violations in writing to the AFSP’s Executive Senior Manager of Finance and Administration, who has the responsibility to investigate all reported complaints. Employees with concerns or complaints may also submit their concerns in writing directly to their supervisor or the Executive Director or the organization’s Compliance Officer.

**Compliance Officer**

AFSP’s Compliance Officer is responsible for ensuring that all complaints about unethical or illegal conduct are investigated and resolved. The Compliance Officer will advise the Executive Director of all complaints and their resolution and will report at least annually to the Chair of the Finance Committee on compliance activity relating to accounting or alleged financial improprieties.

### **Accounting and Auditing Matters**

AFSP's Compliance Officer shall immediately notify the Finance 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 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. 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

AFSP's Compliance Officer 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.

Compliance Officer: \*

{Note: The Compliance Officer may be a board member, the Executive Director, or a third party designated by the organization to receive, investigate and respond to complaints. }

Robert Gebbia

Chief Executive Officer

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Approved by the Board in 2013.