

## **FAIRFAX COURT APPOINTED SPECIAL ADVOCATES WHISTLE BLOWER POLICY**

1. Purpose: The purpose of this policy is to (i) summarize Fairfax CASA's standards of ethical and business conduct, (ii) encourage Fairfax CASA directors, employees and volunteers to report violations or suspected violations of those standards and (iii) specify a procedure for reporting and resolution of such violations and suspected violations.
2. Organizational Standards: Fairfax CASA strives toward the highest ethical standards of conduct and seeks to be a responsible steward of its resources and the public trust. Fairfax CASA adheres to the CASA program requirements set forth in the Virginia Code, as well as the commensurate regulations enforced by the Virginia Department of Criminal Justice Services. Fairfax CASA adheres to generally accepted accounting principles to prepare, present and report its financial statements. Fairfax CASA seeks to comply with National CASA best practice guidelines in all material respects. Fairfax CASA has in place policies and guidelines that pertain to ethics, confidentiality and conflicts of interest that bind its directors, officers, employees and volunteers. As applicable to their respective positions, all directors, officers, employees, and volunteers are expected to comply with the foregoing standards, policies, requirements, principles and guidelines, as well as with all applicable laws and regulations (the foregoing are collectively referred to in this Policy as the "Business Conduct Standards").
3. Reporting: All directors and officers must report to Fairfax CASA all violations and suspected violations of the Business Conduct Standards that come to their attention. Employees and volunteers are encouraged to report such violations and suspected violations.
4. No Retaliation: No individual who in good faith reports a violation or suspected violation of the Business Conduct Standards will be subject to retaliation, including adverse employment consequences, as a result of such good faith actions. A director, officer, employee or volunteer who participates in retaliation against any such individual will be subject to consequences, up to and including dismissal. Any unsubstantiated allegations made with what the Executive Director (in the case of staff or volunteers) or the Board of Directors (with respect to a Board Member) believes to be malicious intent will be considered a serious disciplinary offense.
5. Reporting Guidelines: Information that any Business Conduct Standard has been violated or may have been violated should be submitted through a dated written complaint to the Executive Director and the President of the Board of Directors. If the complaint relates to conduct of the Executive Director or the President, the complaint should be submitted only to the uninvolved individual; if it involves both individuals, the complaint should be submitted to another uninvolved member of the Board (the uninvolved recipient(s) of the complaint are collectively referred to as the "investigator"). Complaints may be submitted anonymously.
6. Process for Handling Complaints: Unless a complaint has been made anonymously, the investigator will acknowledge its receipt in writing within five business days. The investigator will be responsible for investigating the complaint and for making recommended findings (including recommendations for action, if any) to uninvolved members of the Executive Committee of the Board. If the suspected violation is related to corporate accounting practices, internal controls or auditing, the investigator will immediately provide a copy of the complaint to uninvolved members of the Budget/Audit Committee of the Board. The investigator and the

Board should treat information concerning the complaint as confidential (except to the extent publicly available or received or developed independently by Fairfax CASA) and limit disclosure of such information to a need to know basis (except as required by applicable law).

7. Timing of Resolution: Whenever reasonably possible, the investigator will investigate and report to the Board on each complaint within 20 business days after its receipt. Whenever reasonably possible, the Board will reach a decision, including a decision concerning appropriate action, if any, within five business days after receipt of the investigator's report. The Board's decision will be implemented within the time frame directed by the Board or, if no such time frame is specified, within a reasonable time frame. The Board will determine whether or not its decision will be communicated to the individual who initiated the complaint.

Adopted by Board of Directors on March 9, 2009