



Friends of Cancer Research – Whistleblower Policy

Adopted May 2017

Friends of Cancer Research (*Friends*) requires directors, officers and employees to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. As employees and representatives of *Friends*, we must practice honesty and integrity in fulfilling our responsibilities and comply with all applicable laws and regulations.

It is the responsibility of all directors, officers and employees to comply with all applicable laws, regulations and *Friends* policy and to report violations or suspected violations in accordance with this Policy, including

- Theft
- Financial reporting that is intentionally misleading
- Improper or undocumented financial transactions
- Improper destruction of records
- Improper use of assets
- Violations of the organization's conflict of interest policy
- Any other improper occurrences regarding cash, financial procedures, or reporting.

No Retaliation

No director, officer or employee who in good faith reports a violation shall suffer harassment, retaliation or adverse employment consequence. 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. This Policy is intended to encourage and enable employees and others to raise serious concerns within the organization prior to seeking resolution outside of *Friends*. However, reports that are not made in good faith, or otherwise are intended to harass or annoy an employee, may result in disciplinary action, including termination.

Reporting Violations

Friends has an open door policy and suggests that employees share their questions, concerns, suggestions or complaints with someone who can address them properly. In most cases, an employee's supervisor is in the best position to address an area of concern. However, 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 President & CEO or anyone in management whom you are comfortable in approaching.

Supervisors and managers are required to report suspected violations to the CEO. For suspected fraud, or when you are not satisfied or are uncomfortable with following the Organization's open door policy,



individuals should contact the President & CEO directly. The CEO is responsible for investigating and resolving all reported complaints and allegations concerning violations and, at his or her discretion, shall advise the Chair and Founder, Board of Directors or the Finance Committee.

The CEO will 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.