



NFID Whistleblower Policy

NFID maintains a high standard for the ethical conduct of its staff and seeks to conduct its business activities with utmost propriety, to protect the assets, interests, and reputation of NFID. NFID will not tolerate and will promptly and thoroughly investigate all instances and allegations of fraudulent, illegal, or unethical activity regarding NFID funds, documents, equipment, other assets, or operations that involves staff, vendors, or other parties.

This policy applies to all NFID staff and will be strictly enforced. Violations of this policy may result in disciplinary action, up to and including termination.

NFID has instituted certain internal controls intended to safeguard NFID assets and operations. All personnel should be familiar with the risks and exposures inherent in their area of responsibility and should be alert for any indications of improper activity.

All personnel have a responsibility to the organization to report any known or suspected fraudulent, illegal, or unethical activity. NFID will conduct its investigation of such a report on a confidential basis to the extent possible given the need for investigation and resolution of the matter. It is NFID policy not to allow retaliation for reports made in good faith under this policy, and no reprisals whatsoever will be taken against a person for making such a report.

All reports of known or suspected fraudulent, illegal, or unethical activity should be made to the Executive Director immediately upon learning of such activity.

In consultation with legal counsel, if appropriate, the Executive Director will consider the report and take whatever action is determined to be appropriate under the law and circumstances.

In the case of reports of known or suspected fraudulent, illegal, or unethical activity involving the Executive Director, such disclosure should be directed to the NFID President.