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**Whistleblower Policy**

**Purpose**

EIDSFC requires board members, committee members, and employees to observe high standards of business and personal ethics in the conduct of their duties and responsibilities, and all directors, committee members to comply with all applicable laws and regulatory requirements.

**Reporting Responsibility**

EIDSFC seeks to have an “Open Door Policy” and encourages board members to share their questions, concerns, suggestions or complaints regarding EIDS and its operations with someone who can address them properly. However, if a board member is not comfortable speaking with the President or is not comfortable with President’s response, the board member is encouraged to speak with anyone on the Board whom they are comfortable in approaching, or to directly contact the EIDS outside legal counsel, whose contact information can be obtained from the President.

 **No Retaliation**

No board member who in good faith reports a violation of a law or regulation requirement shall suffer harassment, retaliation or adverse consequence. A board member who retaliates against someone who has reported a violation in good faith is subject to discipline up to an including termination of being a board member. This Whistleblower Policy is intended to encourage and enable persons to raise serious concerns within EIDS prior to seeking resolution outside the EIDS.

**Compliance Officer**

EIDSFC President, will act as the EIDS’s Compliance Officer. The Compliance Officer is responsible for investigating and resolving all board members complaints and allegations concerning violations of the Principles and / or Code. The President or his or her designee will take on the Compliance Officer role if the compliant involves the President. If the complaint involves both more than one board member, outside legal counsel will carry out the functions of the Compliance Officer.

**Accounting and Auditing Matters**

The Finance Committee of the Board of Directors shall address all reported concerns or complaints regarding corporate accounting practices, internal controls or auditing. The Compliance Officer shall immediately notify the Finance Committee of any such complaint and work with the Committee until the matter is resolved.

**Requirement of Good Faith**

Anyone filing a complaint concerning a violation or suspected violation of the law or regulation requirements 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 or may be submitted anonymously. 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**

The Compliance Officer, or the person responsible for carrying out the Compliance Officer’s role with respect to a reported or suspected violation, will acknowledge receipt of the reported violation or suspected violation by writing letter (or e-mail) to the complainant within five business days. All reports will be promptly investigated and appropriate corrective action will be taken if warranted by the investigation.

*Sourcing for policy and produces were pulled from Smartgivers.org*