

WHISTLEBLOWER AND EXTERNAL COMPLAINT POLICY THE FREEPORT COMMUNITY FOUNDATION

Adopted March 20, 2008

The Freeport Community Foundation (hereinafter “FCF”) has a responsibility for the stewardship of its resources and the public and private support that enables it to pursue its mission. FCF is committed to compliance with the laws and regulations to which it is subject and to promulgating its policies and procedures to interpret and apply these laws and regulations. This policy will strengthen and promote ethical practices.

REPORTING RESPONSIBILITY

It is the responsibility of all Directors, Officers and Employees of FCF to comply with the Code of Ethics and the Conflict of Interest Policy and to report violations or suspected violations in accordance with this Policy.

NO RETALIATION

No Director, Officer or Employee of FCF who in good faith reports a violation of the Code of Ethics or Conflict of Interest Policy shall suffer harassment, retaliation or adverse employment consequences. Any Director, Officer or Employee of FCF who retaliates against someone in this regard is subject to discipline, up to and including termination of employment or removal from the Board. This policy is intended to handle such concerns internally prior to seeking resolution outside of the organization.

REPORTING VIOLATIONS

The reporting person may address their concerns to the President and/or the Executive Director of FCF. If either such person is involved in the alleged complaint, the issue may be addressed to the other or may be addressed to any Board Member. All Directors and Officers of FCF are required to report suspected violations of the Code of Ethics or the Conflict of Interest Policy to the President and Executive Director or directly to the full Board if both of said persons are alleged to be involved in such complaint.

COMPLIANCE OFFICER’S DUTIES

The President and Executive Director of FCF are hereby designated the Compliance Officers of this Policy. They are mutually charged with the responsibility of investigating and attempting to resolve all such complaints, and they shall do so with all due speed. They shall report to the Board the results of the investigation and resolution or propose plan of action all complaints upon completion of their efforts.

ACCOUNTING AND AUDITING MATTERS

The Finance Committee shall address all reporting complaints or concerns relative to accounting practices or auditing. The Finance Committee shall report the complaint and investigation to the Compliance Officers. The Compliance Officers shall work with the Finance Committee to resolve all such complaints.

ACTING IN GOOD FAITH

All complaints raised pursuant to this Policy must be made in good faith and be made upon reasonable grounds to believe that an ethics or conflict of interest violation has been made. Any complaint raised which is found to be made maliciously or in bad faith will result in discipline of the complaining party up to, and including, termination of employment or removal from the Board of Directors.

CONFIDENTIALITY

Any complaint pursuant to this Policy may be made anonymously or on a confidential basis. All complaints shall remain confidential to the extent possible, taking into account the need for a complete investigation.

EXTERNAL COMPLAINTS

Any complaint generated by a person not an employee, director or officer of FCF, shall be directed immediately by the recipient of such complaint to the Compliance Officers, who shall then be charged with their investigation responsibilities as set forth above.