X. WHISTLEBLOWER POLICY

A. General
Minnesota Quilters, Inc. (MQ) Code of Ethics and Conduct Code requires directors, officers, employees, members and volunteers to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. As representatives of MQ, we must practice honesty and integrity in fulfilling our responsibilities and comply with all applicable laws and regulations.

B. Reporting Responsibility
It is the responsibility of all directors, officers, employees, members and volunteers to comply with the Code and to report violations or suspected violations in accordance with this Whistleblower Policy.

C. No Retaliation
No director, officer, employee, member or volunteer who in good faith reports a violation of the Code 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 Whistleblower Policy is intended to encourage and enable employees and others to raise serious concerns within MQ prior to seeking resolution outside MQ.

D. Reporting Violations
This Policy addresses MQ’s open door policy and suggests that employees and others share their questions, concerns, suggestions or complaints with someone who can address them properly. In most cases, a director or committee chair is in the best position to address an area of concern. However, if you are not comfortable speaking to that person or you are not satisfied with that person’s response, you are encouraged to speak with someone on the Board of Directors whom you are comfortable in approaching. MQ Board of Directors and others are required to report suspected violations of the Code of Conduct to MQ’s Compliance Officer, who has specific and exclusive responsibility to investigate all reported complaints and allegations concerning violations of the Code of Conduct. For suspected fraud, or when you are not satisfied or uncomfortable with following MQ’s open door policy, individuals should contact MQ’s Compliance Officer directly.

E. Compliance Officer
MQ’s Compliance Officer is the immediate Past President. The Compliance Officer is responsible for investigating and resolving all reported complaints and allegations concerning violations of the Code and, at her discretion, shall advise the Board of Directors and/or the Finance/Audit committee. The Compliance Officer is required to report to the Board of Directors at least annually on compliance activity.

F. Accounting and Auditing Matters
The Finance/Audit 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/Audit committee of any such complaint and work with the committee until the matter is resolved.

G. Acting in Good Faith
Anyone filing a complaint concerning a violation or suspected violation of the Code must be acting in good faith and have reasonable grounds for believing the information disclosed indicates a violation of the Code. 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.
H. 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.

I. Handling of Reported Violations
The Compliance Officer will notify the sender and 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.

J. Copyright
The National Council of Nonprofit Associations (NCNA) is the network of state and regional nonprofit associations serving over 22,000 members in 46 states and the District of Columbia. NCNA links local organizations to a national audience through state associations and helps small and mid-sized nonprofits: manage and lead more effectively; collaborate and exchange solutions; save money through group buying opportunities; engage in critical policy issues affecting the sector; and achieve greater impact in their communities.