

BOSTON EDUCATIONAL DEVELOPMENT FUND WHISTLEBLOWER POLICY



Background

The Boston Educational Development Foundation, Inc. (BEDF) requires its officers, directors, employees, staff, volunteers, and users of its fiscal support to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. Users of our fiscal sponsorship services are to apply this policy in a supplementary manner to their compliance with similar policies in place in their organizations. The officers, directors, employees, volunteers and staff of BEDF, and users of our fiscal sponsor services must practice honesty and integrity in fulfilling their responsibilities and comply with all applicable laws and regulations related to tax-exempt organizations, and protect against any improper use of funds administered by BEDF.

Reporting Responsibility

It is the responsibility of officers, directors, employees, volunteers and staff of BEDF to report violations or suspected violations of ethical standards, law, or regulations that govern tax exempt organizations and to report potential fraud. Users of our fiscal sponsorship services are highly encouraged to report suspected violations and fraud given their exposure to the operations of BEDF.

No Retaliation

This Whistleblower Policy is intended to encourage and enable all officers, directors, employees, volunteers and staff of BEDF, and users of our fiscal sponsorship services on a voluntary basis, to raise serious concerns related to the operations of BEDF for investigation and appropriate action, prior to seeking resolution outside BEDF.

No officer, director, employee, volunteer or staff of BEDF, nor any other user of our fiscal sponsorship services, who in good faith reports a violation or suspected violation shall suffer harassment, retaliation or adverse consequence. An officer, director, employee or staff of BEDF, or user of our fiscal services who retaliates against someone who has reported a violation in good faith is subject to discipline up to and including termination of employment or service (for BEDF staff, officers, directors, employees and volunteers) or withdrawal from the fiscal services provided (for BEDF fiscal sponsor users.)

Acting in Good Faith

Anyone reporting a violation or suspected violation must act in good faith and have reasonable grounds for believing the information disclosed indicates an improper behavior or practice, or a violation of this Policy.



Reporting Procedure

BEDF has an open-door policy. Employees, officers, directors, volunteers and staff of BEDF, as well as users of our fiscal services, are encouraged to share their questions, concerns, suggestions or complaints with someone who can address them properly. In most cases, the Executive Director of BEDF, and Fund Managers of our fiscal services are in the best position to address an area of concern.

All reported violations collected by the representatives stated in the former paragraph are required to be communicated to the Board of Directors of BEDF. However, if you are not comfortable speaking with any of these individuals, or if you are not satisfied with the response, you are encouraged to speak with any of the directors or officers of BEDF whom you are comfortable in approaching.

Concerns may be also be submitted anonymously. Such anonymous concerns should be in writing and addressed directly to the Board of Directors of BEDF. Their contact information may be obtained from the Executive Director of BEDF.

Handling of Reported Violations

The Board of Directors of BEDF is to investigate and resolve all reported complaints and allegations concerning such violations. All reports will be investigated and appropriate corrective action will be taken if warranted by the investigation.

Confidentiality

Violations or suspected violations may be submitted on a confidential basis by the complainant or anonymously. Reports of violations or suspected violations will be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation.