



WHISTLEBLOWER AND FRAUD REPORTING POLICY

Purpose

NCCF's Code of Ethics & Conduct requires directors, officers, and employees to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. As employees and representatives of the organization, we must practice honesty and integrity in fulfilling our responsibilities and comply with all applicable laws and regulations.

The following is intended to encourage and enable directors, employees, and volunteers to raise illegal, unacceptable or suspicious activity ("Concerns") within NCCF for investigation.

General

The objectives of the Whistleblower and Fraud Reporting Policy ("Policy") are to establish policies and procedures for reporting unethical or unlawful behavior by employees, directors, or volunteers of NCCF on a confidential, anonymous basis.

No Retaliation

No director, employee, or volunteer who reports a Concern in good faith shall be subject to retaliation or, in the case of an employee, adverse employment consequences, because they have reported a Concern. Any volunteer or employee who retaliates against someone who has reported a Concern in good faith is subject to discipline up to and including dismissal from the volunteer position or termination of employment.

Policy Distribution

This policy will be distributed to all employees and directors of NCCF and shall be included in the Employee Manual.

Reporting Concerns – Procedures

Each director, employee, or volunteer of NCCF has an obligation to report questionable or improper accounting or auditing matters or other unethical/unlawful acts or practices.

- Reportable Concerns include:
 - questionable accounting or auditing matters,
 - violation of a state or federal statute,
 - violation or noncompliance with a state or federal rule or regulation, or
 - unsafe working conditions or work practices in the exercise of NCCF business

An employee or volunteer of NCCF should discuss a Concern with the President of NCCF. A director should report Concerns to the President or directly to the chair of the Audit Committee. If the chair is unavailable, any member of the committee may be contacted.



If an employee, director, or volunteer is uncomfortable speaking with the President of NCCF, he/she should report the Concern directly to an Audit Committee member. Concerns may also be submitted anonymously in writing or via voice mail to an Audit Committee member. A list of Audit Committee members will be issued annually.

Acting in Good Faith

Anyone reporting a Concern must act in good faith and have reasonable grounds for believing the information disclosed indicates an improper accounting or auditing practice or a violation of the policies and procedures of NCCF.

Handling of Reported Violations

All reported Concerns regarding corporate accounting practices, internal controls, or the annual audit will be forwarded to members of the Audit Committee in accordance with the procedures set forth in this Policy. The Audit Committee will be responsible for investigating and making appropriate recommendations regarding those Concerns.

When a Concern is reported to the Audit Committee, the Chair of the committee should immediately notify other committee members and the President (unless he or she is involved in the Concern) will investigate. The Audit Committee has the authority to retain outside legal counsel, accountants, private investigators, or any other resource deemed necessary to conduct a full and complete investigation of the allegations. If warranted, the Audit Committee will recommend corrective action to the Board of Directors. Any actions taken must include follow-up with the complainant.

Confidentiality

Reports of Concerns, and investigations pertaining thereto, shall be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation. Disclosure of reports of Concerns to individuals not involved in the investigation will be viewed as a serious disciplinary offense and may result in discipline, up to and including dismissal from the volunteer position or termination of employment.