

AMERICAN FAMILY ASSOCIATION, INC.

Whistle-Blower Protection Policy

Policy:

AFA is committed to conducting its ministry in a manner that it is above reproach. Consistent with that commitment, this Whistle-Blower Policy aims to provide reassurance to a staff member who in good faith reports concerns about suspected misconduct, dishonesty or fraud, that they will be protected from reprisal.

Each director, officer or staff member has an obligation to report in accordance with this policy (a) questionable or improper accounting or auditing matters, and (b) other acts of misconduct, dishonesty, or fraud.

No director, officer or staff member who in good faith reports a concern shall be subject to retaliation or adverse employment consequences. Moreover, a director, officer or staff member who retaliates against someone who has reported a concern in good faith is subject to discipline up to and including removal from the Board or termination of employment.

Procedure:

1. Reporting. In light of Matthew 18 and Galatians 6:1, a staff member should first discuss the problem with the individual concerned, but should notify their immediate supervisor (without specifics) before doing so. If, after speaking with the individual, the staff member continues to have reasonable grounds to believe the concern is valid, the staff member should invite the individual to meet together with the President, Executive Vice President or Human Relations Director (“Key Officers”). If the individual is unwilling participate in such a meeting, the staff member shall report the concern to one of the Key Officers. If the staff member’s supervisor is a subject of the concern, the staff member may report the matter directly to one of the Key Officers.
2. Documentation and Follow-Through. If the concern is reported to a Key Officer verbally, the Key Officer shall assist the reporting staff member in documenting the concern in writing. The Key Officer may provide additional information to the staff member that alleviates the concern, or schedule a meeting including the staff

member and the individual who is the subject of the concern. At such meeting, the individual who is the subject of the concern shall be given the opportunity to give an explanation.

3. If the Key Officer fails to follow-through on a report of concern that is brought to him or her, the concerned staff member shall submit the concern in writing to the President, Chairman of the Board of Directors or the Chairman of the Governance Committee of the Board of Directors.
4. Anonymous Reports. Anyone can submit an anonymous report of suspected fraud or misconduct in writing to the President, Chairman of the Board of Directors or the Chairman of the Governance Committee of the Board of Directors.
5. Disposition. All reports shall be promptly investigated and appropriate corrective action taken if warranted. The complainant shall be given a written statement of the disposition.