

ASSOCIATION OF AMERICAN FEED CONTROL OFFICIALS

WHISTLEBLOWER POLICY

In keeping with the policy of maintaining the highest standards of conduct and ethics, the Association of American Feed Control Officials (AAFCO) will investigate any suspected fraudulent or dishonest use or misuse of AAFCO's resources or property by council members, volunteers or members.

Council members, volunteers and members are encouraged to report suspected fraudulent or dishonest conduct (i.e., to act as "whistleblower"), pursuant to the procedures set forth below.

Reporting

A person's concerns about possible fraudulent or dishonest use or misuse of resources or property should be reported to the Complaint Officer. If, for any reason, a person finds it difficult to report his or her concerns to the Complaint Officer the person may report the concerns directly to the AAFCO President. Alternately, to facilitate reporting of suspected violations where the reporter wishes to remain anonymous, a written statement may be submitted to one of the individuals listed above.

Definitions

Baseless Allegations

Allegations made with reckless disregard for their truth or falsity. Individuals making such allegations may be subject to disciplinary action by AAFCO, and/or legal claims by individuals accused of such conduct.

Fraudulent or Dishonest Conduct

A deliberate act or failure to act with the intention of obtaining an unauthorized benefit. Examples of such conduct include

- Forgery or alteration of documents
- Unauthorized alteration or manipulation of computer files
- Fraudulent financial reporting
- Pursuit of a benefit or advantage in violation of AAFCO's Conflict-of-Interest Policy
- Misappropriation or misuse of AAFCO resources, such as funds, supplies, or other assets
- Authorizing or receiving compensation for goods not received or services not performed
- Authorizing or receiving compensation for hours not worked

Whistleblower

An individual who informs a Complaint Officer or President about an activity relating to AAFCO which that person believes to be fraudulent or dishonest.

Rights and Responsibilities

Investigation

All relevant matters, including suspected but unproved matters, will be reviewed and analyzed, with documentation of the receipt, retention, investigation, and treatment of the complaint. Appropriate corrective action will be taken, if necessary, and findings will be communicated to the reporting person. Investigations may warrant investigation by independent persons such as auditors and/or attorneys.

Whistleblower Protection

AAFCO will protect whistleblowers as defined below:

- AAFCO will use its best efforts to protect whistleblowers against retaliation. Whistleblowing complaints will be handled with sensitivity, discretion, and confidentiality to the extent allowed by the circumstances and the law. Generally, this means that whistleblower complaints will only be shared with those who have a need to know so that AAFCO can conduct an effective investigation, determine what action to take based on the results of any such investigation, and in appropriate cases, with law enforcement personnel. (Should disciplinary or legal action be taken against a person or persons as a result of a whistleblower complaint, such persons may also have the right to know the identity of the whistleblower.)
- Board members, volunteers and members of AAFCO may not retaliate against a whistleblower for informing management about an activity which that person believes to be fraudulent or dishonest with the intent or effect of adversely affecting the whistleblower's well being, including but not limited to, threats of physical harm, or social harm. Whistleblowers who believe that they have been retaliated against may file a written complaint with the Complaint Officer. Any complaint of retaliation will be promptly investigated and appropriate corrective measures taken if allegations of retaliation are substantiated. This protection from retaliation is not intended to prohibit individuals from taking retaliatory action, Whistleblowers must be cautious to avoid baseless allegations (as described earlier in the definitions section of this policy).

This policy was adopted at the AAFCO Board meeting held July 30, 2010, in Portland OR, and will remain in effect as a permanent policy of the Board until amended or removed by Board action.