

# COMMUNITY MATTERS: INSURANCE PARTNERS OF CHARLOTTE

## WHISTLEBLOWER POLICY

### General

The directors, officers and employees of Community Matters: Insurance Partners of Charlotte (the “Organization”) are expected 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.

### Who May Report

All persons are encouraged to report suspected misconduct, dishonesty, fraud or other violations of the Organization’s governance documents, policies and procedures, or state or federal law (“Misconduct”) in accordance with this Whistleblower Policy. It is the responsibility and obligation of all directors, officers and employees of the Organization to do so.

### No Retaliation

No person who in good faith reports any suspected Misconduct shall suffer harassment, retaliation or adverse employment consequences. A director, officer or employee who retaliates against someone who has reported suspected Misconduct 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 the Organization prior to seeking resolution outside the Organization.

### Reporting Procedure

The Organization has an open door policy. Employees and any other persons who have concerns relating to suspected Misconduct are encouraged to share their questions, concerns, suggestions or complaints with someone who can address them properly. For employees, a supervisor is often in the best position to address an area of concern. However, if you are not comfortable speaking with your supervisor or you are not satisfied with your supervisor’s response, you are encouraged to speak with anyone in management whom you are comfortable approaching. Supervisors and managers are required to report suspected Misconduct to the Organization’s Compliance Officer, who has specific and exclusive responsibility to investigate all reported Misconduct. If you are not satisfied or comfortable with the Organization’s open door policy, or if fraud is suspected, you may contact the Organization’s Compliance Officer directly via:

Email to: info@communitymatterscharlotte.org;

Mail to: P.O. Box 1000, Charlotte, North Carolina 28201-1000; or

Telephone to: 704-522-5255.

## **Compliance Officer**

The Organization's Compliance Officer is responsible for investigating and resolving all reported complaints and allegations concerning suspected Misconduct and, at his discretion, shall advise the Chairman and/or the audit committee at such time that an audit committee is appointed. The Compliance Officer has direct access to the board of directors and/or the audit committee and is required to report to the board of directors and/or audit committee at least annually on compliance activity. The Organization's Compliance Officer shall be appointed by the board of directors.

## **Accounting and Auditing Matters**

The board of directors and/or the audit committee shall address all reported concerns or complaints regarding corporate accounting practices, internal controls or auditing. The Compliance Officer shall immediately notify the board of directors and/or audit committee of any such complaint and work with the board or committee until the matter is resolved.

## **Acting in Good Faith**

Anyone filing a complaint must be acting in good faith and have reasonable grounds for believing that Misconduct is likely to have taken place. 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.

## **Confidentiality**

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

## **Handling of Reported Misconduct**

The Compliance Officer will notify the sender and acknowledge receipt of the report within five business days (provided that the sender is not anonymous). All reports will be promptly investigated and appropriate corrective action will be taken if warranted by the investigation.

Dated as of September \_\_\_\_, 2011