**F.W.S. Policy for Whistleblower Action Protection**

**Scope:** The Augustine Fellowship, S.L.A.A., Fellowship-Wide Services, Inc. (F.W.S.) is a non-profit organization, organized under the laws of the State of Texas. While Texas law does not require non-profits like F.W.S. to have a broad whistleblower policy, this policy is derived from the language of the Sarbanes-Oxley Act and is intended to provide protection for reports of theft, fraud or possible illegal conduct allegedly committed by employees, contractors, board members, consultants and volunteers.

The whole intent of this policy is to create a confidential means of reporting such questionable conduct and to protect the individual who has reported such conduct. The policy is not a vehicle for Fellowship members to report violations of the 12 Steps, 12 Traditions or the 12 Concepts as there are other means available to resolve those violations within the framework of the S.L.A.A. Fellowship. Moreover, confidentiality is the cornerstone of this policy to protect the reporter from retaliation. If the reporter does not avail themselves of this confidentiality protection and reports allegations of these violations to other members of the Fellowship or to the general public, such a breach of confidentiality would act as a complete waiver to the protections of this policy. Further, this policy shall not apply to baseless allegations, i.e., allegations made with reckless disregard for their truth or falsity.

**Policy:** In keeping with the policy of maintaining the highest standards of conduct and ethics, F.W.S. will investigate any suspected fraudulent or dishonest use or misuse of F.W.S.’s resources or property by employees, contractors, board members, consultants or volunteers. All employees, contractors, consultants, and volunteers (which include members of the Board of Trustees throughout this Policy) shall act with honesty, integrity and openness in all their dealings as representatives of the organization. Failure to follow these standards may result in disciplinary action including possible termination of employment or contract, dismissal from the Board of Trustees or volunteer duties and possible civil or criminal prosecution if warranted.

It is the intent of F.W.S. to adhere to all laws and regulations that apply to the organization and the underlying purpose of this policy is to support the organization’s goal of legal compliance. The support of all employees, contractors, consultants and volunteers is necessary to achieving compliance with various laws and regulations. An employee, contractor, consultant or volunteer is encouraged to bring any alleged unlawful activity, policy, or practice to the attention of F.W.S. and provide F.W.S. with a reasonable opportunity to investigate and correct the alleged unlawful activity.

F.W.S. will not retaliate against an employee, contractor, consultant, or volunteer who:

Has, in good faith, made a protest or raised a complaint against any activity, policy or practice of F.W.S., or of another individual or entity with whom F.W.S. has a business relationship, on the basis of a reasonable belief that the practice is in violation of law, or rule, or regulation mandated pursuant to laws related to theft, fraud, or similar unethical conduct; or

has disclosed or threatens to disclose to a F.W.S. supervisor, principal or a public body, any activity, policy, or practice of F.W.S. that the individual in good faith reasonably believes is in violation of law, or rule, or regulation mandated pursuant to laws related to theft, fraud, or similar unethical conduct.

This protection shall also apply in the event of a good faith report to law enforcement or other outside agency. Notwithstanding, the protection shall not apply to a report to other members of the Fellowship or to the general public. Confidentiality shall be maintained on a “need to know” basis only.

“Retaliate” is defined in this policy to include discharge, demotion, suspension, direct or indirect threats, harassment or discrimination in any other manner, made in response to a good faith complaint, and shall apply equally to employees, contractors, consultants and volunteers as may be more fully described and defined by Texas law.

**Procedure:** If any employee, contractor, consultant or volunteer reasonably believes that some activity, policy or practice of F.W.S. is in violation of law, or rule, or regulation mandated pursuant to laws related to theft, fraud, or similar unethical conduct the employee, contractor, consultant or volunteer is encouraged to file a written complaint with F.W.S. as provided below.

Complaints can be made to any of the following persons (referred to above as principals) according to the discretion of the complaining individual:

1. The F.W.S. Office Supervisor,
2. An Officer of F.W.S. (President, Treasurer or Secretary),
3. Designated non-BOT members of the Board HR/Personnel and Board Finance Committees
4. Any Board of Trustees Member.

All relevant matters, including suspected but unproved matters, will be reviewed and analyzed, with documentation if any. Notwithstanding, any allegations which are brought, but which are subsequently revealed to the general public or to other members of the Fellowship by the complainant, may result in any further investigation being suspended or terminated. Appropriate corrective action will be taken, if necessary, and findings will be communicated back to the reporting person. Cases may warrant investigation by an independent person such as auditors and/or attorneys.

This Policy is to be posted at the F.W.S. Office in a conspicuous location and posted on the F.W.S. Website. Inquiries on this Policy should be made to the Designated non-BOT members of the Board HR/Personnel and Finance Committees at <https://slaafws.org/whistleblowercomplaints>.

Please note that the Designated non-BOT member of the Board Finance Committee is also copied on emails sent to this email address.

Approved: BOT Feb 12, 2022