**CODE OF ETHICS AND WHISTLEBLOWER POLICY**

**Purpose**

Central Missouri Community Development Corporation requires and encourages directors, officers, employees, affiliates and volunteers to observe and practice high standards of business and personal ethics in the conduct of their duties, responsibilities, and activities. The employees and representatives of the corporation must practice honesty and integrity in fulfilling their responsibilities and comply with all applicable laws and regulations. It is the intent of Central Missouri Community Development Corporation to adhere to all laws and regulations that apply to the corporation and the underlying purpose of this policy is to support the corporation’s goal of legal compliance.

**Fraud**

Fraud is defined as the intentional, false representation or concealment of a material fact for the purpose of inducing another to act upon it to his or her injury. Any irregularity that is detected or suspected must be reported immediately. The terms defalcation, misappropriation, and other fiscal irregularities refer, but are not limited, to:

* Any dishonest or fraudulent act
* Misappropriation of funds, securities, supplies, or other assets
* Impropriety in the handling or reporting of money or financial transactions
* Profiteering as a result of insider knowledge of corporation activities
* Disclosing confidential and proprietary information to outside parties
* Disclosing to other persons any securities activities engaged in or contemplated by the corporation
* Inappropriately or illegally accepting or seeking anything of material value from donors, contractors, vendors, or persons providing services/materials to the corporation
* Destruction, removal, or inappropriate use of records, furniture, fixtures, and equipment
* Any similar or related irregularity

**Reporting Violations**

If any director, officer, volunteer, affiliate or employee reasonably believes that some policy, practice, or activity of Central Missouri Community Development Corporation is in violation of law or constitutes an unethical behavior or action, a written complaint must be filed by that person with the board chairperson or vice-chairperson.

**Acting in Good Faith**

Anyone filing a complaint concerning a violation or suspected violation must be acting in good faith and have reasonable grounds for believing the information disclosed indicates a violation. Any allegations that prove not to be substantiated and which prove to have been made maliciously or knowingly to be false shall be viewed as a serious offense.

**Retaliation**

Said person is protected from retaliation only if she/he brings the alleged unlawful activity, policy, or practice to the attention of Central Missouri Community Development Corporation and provides the Central Missouri Community Development Corporation with a reasonable opportunity to investigate and correct the alleged unlawful activity. The protection described below is only available to individuals that comply with this requirement.

Central Missouri Community Development Corporation shall not retaliate against any director, officer, staff or employee who in good faith, has made a protest or raised a complaint against some practice of Central Missouri Community Development Corporation or of another individual or entity with whom Central Missouri Community Development Corporation has a business relationship, on the basis of a reasonable belief that the practice is in violation of law, or a clear mandate of public policy.

Central Missouri Community Development Corporation shall not retaliate against any director, officer, staff or employee who disclose or threaten to disclose to a supervisor or a public body, any activity, policy, or practice of Central Missouri Community Development Corporation that the individual reasonably believes is in violation of a law, or a rule, or regulation mandated pursuant to law or is in violation of a clear mandate of public policy concerning the health, safety, welfare, or protection of the environment.

**Confidentiality**

Violations or suspected violations may be submitted on a confidential basis by the complainant or may be submitted anonymously. Reports of violations or suspected violations shall be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation.

**Handling of Reported Violations**

Unless reported anonymously and without a method for contact, the board chairperson or vice-chairperson shall notify the sender and acknowledge receipt of the reported violation or suspected violation. All reports shall be promptly reported to and investigated by the board and/or its appointed committee. Appropriate corrective action shall be taken if warranted by the investigation. Decisions to prosecute or refer the investigation results to the appropriate law enforcement and/or regulatory agencies for independent investigation may be made in conjunction with legal counsel, as may the final decisions on the dispositions of the reports.

This policy shall be made available to all directors, officers, staffs or employees and they shall have the opportunity to ask questions about the policy.