

**National Society Descendants of American Farmers
NSDOAF**

WHISTLEBLOWER POLICY

GENERAL

NSDOAF Conflict of Interest/Code of Organization Conduct (hereinafter referred to as the Code) requires officers, executive board members, and committee chairmen to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. The same high standards are expected of all members and volunteers. Officers, executive board members, committee chairmen and committee members are representatives of NSDOAF and must practice honesty and integrity in fulfilling their responsibilities and comply with all applicable laws and regulations.

The objectives of the NSDOAF Whistleblower Policy are to establish policies and procedures for:

- The submission of concerns regarding questionable accounting or audit matters by officers, committee chairmen, committee members, and other stakeholders of NSDOAF, on a confidential and anonymous basis.
- The receipt, retention, and treatment of complaints received by NSDOAF regarding accounting, internal controls, or auditing matters.
- The protection of officers, committee chairmen, committee members, patriot fund trustees, perpetual fund trustees, and other stakeholders reporting concerns from retaliatory actions.

REPORTING RESPONSIBILITY

Each officer, committee chairman, executive board member, committee member and other stakeholder of NSDOAF has an obligation to report in accordance with this Whistleblower Policy (a) questionable or improper accounting or auditing matters, and (b) violations and suspected violations of the NSDOAF Organization's Code (hereinafter collectively referred to as Concerns).

AUTHORITY OF NSDOAF COMPLIANCE OFFICER

The NSDOAF Compliance Officer is appointed by the President National and their term will end simultaneously with the term of the President National. All reported Concerns will be forwarded to the NSDOAF Compliance Officer in accordance with the procedures set forth herein. The NSDOAF Compliance Officer shall be responsible for investigating and making appropriate recommendations to the NSDOAF Executive Committee. If the NSDOAF Compliance Officer is the subject of the Concern, the NSDOAF President National will receive the reported Concerns, and be responsible for investigating, and making appropriate recommendations to the NSDOAF Executive Board.

NO RETALIATION

This Whistleblower Policy is intended to encourage and enable officers, committee chairmen, executive board members and other stakeholders to raise Concerns within NSDOAF for investigation and appropriate action. With this goal in mind, no officer, committee chairman, executive board member or other stakeholder who, in good faith, reports a Concern shall be subject to retaliation. Moreover, a NSDOAF member who retaliates against someone who has reported a Concern in good faith is subject to discipline consistent with the NSDOAF Constitution and Bylaws.

REPORTING CONCERNS

NSDOAF Members and Other Stakeholders

NSDOAF members and other stakeholders should submit Concerns in writing directly to the NSDOAF Compliance Officer, or in the case of a Concern about the Compliance Officer, to the NSDOAF President National. Contact information for the NSDOAF Compliance Officer and President National may be obtained from the NSDOAF website.

NSDOAF Web Based Hotline

Concerns can be submitted to the NSDOAF Compliance Officer, or the President National in case of Concerns about the Compliance Officer, through the Web Based Hotline (Under development), which is included on the NSDOAF website. An online form is being created for reporting Concerns directly to the appropriate Officer.

Acting in Good Faith

Anyone reporting a Concern must act in good faith and have reasonable grounds for believing the information disclosed indicates an improper accounting or auditing practice, or a violation of the NSDOAF Organization Code. The act of making allegations that prove to be unsubstantiated, and that prove to have been made maliciously, recklessly, or with the foreknowledge that the allegations are false, will be viewed as a serious disciplinary offense and may result in discipline consistent with NSDOAF Constitution and Bylaws.

HANDLING OF REPORTED VIOLATIONS

The NSDOAF Compliance Officer shall address all reported Concerns. The NSDOAF Compliance Officer shall immediately notify the NSDOAF President National of any such reported Concern. The NSDOAF Compliance Officer will notify the sender and acknowledge receipt of the Concern within five business days, if possible. It will not be possible to acknowledge receipt of anonymously submitted Concerns.

All reports will be promptly investigated by the NSDOAF Compliance Officer, and appropriate corrective action will be recommended to the NSDOAF President National and the Executive Board, if warranted by the investigation. In addition, action taken must include a conclusion and/or follow-up with the complainant for complete closure of the Concern.

The NSDOAF Compliance Officer, with the concurrence of the Executive Board, has the authority to obtain resources deemed necessary to conduct a full and complete investigation of the allegations.

CONFIDENTIALITY

Reports of Concerns and investigations pertaining thereto, shall be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation.

Disclosure of reports of Concerns to individuals not involved in the investigation will be viewed as a serious disciplinary offense and may result in discipline consistent with NSDOAF Constitution and Bylaws.