

Policy on Suspected Misconduct

Like all organizations, DMS faces many risks associated with fraud, abuse, and other forms of misconduct. The impact of these acts, collectively referred to as misconduct throughout this policy, may include, but not be limited to:

- Financial losses and liabilities
- Loss of current and future revenue and customers
- Negative publicity and damage to the Organization's good public image
- Loss of employees and difficulty in attracting new personnel
- Deterioration of member morale
- Harm to relationships with clients, vendors, bankers, and subcontractors
- Litigation and related costs of investigations, etc.

DMS is committed to establishing and maintaining an environment of the highest ethical standards. Achievement of this goal requires the cooperation and assistance of every member and volunteer at all levels of the Organization.

For purposes of this policy, misconduct includes, but is not limited to:

1. Actions that violate the Corporation's Code of Conduct (and any underlying policies) or any of the accounting and financial policies included in this manual
2. Fraud
3. Forgery or alteration of checks, bank drafts, documents or other records (including electronic records)
4. Destruction, alteration, mutilation, or concealment of any document or record with the intent to obstruct or influence an investigation, or potential investigation, carried out by a lawfully constituted public official, or by the Organization in connection with this policy
5. Disclosure to any external party of proprietary information or confidential personal information obtained in connection with employment with or service to the Organization
6. Unauthorized personal or other inappropriate use of equipment, assets, services, personnel or other resources
7. Acts that violate Federal, state, or local laws or regulations
8. Accepting or seeking anything of material value from contractors, vendors, or persons providing goods or services to DMS. Exception: gifts less than a nominal value (\$50).
9. Impropriety of the handling or reporting of financial transactions.
10. Failure to report known instances of misconduct in accordance with the reporting responsibilities described herein (including tolerance by members of misconduct of others).

Fraud is further defined to include, but not be limited to

- Theft, embezzlement, or other misappropriation of assets (including assets of or intended for the DMS, as well as those of our members, subcontractors, vendors, contractors, suppliers, and others with whom the DMS has a business relationship)
- Intentional misstatements in the DMS's records, including intentional misstatements of accounting records or financial statements
- Authorizing or receiving payment for goods not received or services not performed
- Forgery or alteration of documents, including but not limited to checks, timesheets (to the extent that they exist), contracts, purchase orders, receiving reports, inventories

DMS prohibits each of the preceding acts of misconduct on the part of board members, officers, volunteers and others responsible for carrying out DMS activities.

Every member, officer, and volunteer is responsible for immediately reporting suspected misconduct to the Treasurer or President. Additionally, anonymous reporting of allegations can be provided to the Treasurer or President via email or sealed envelope marked "Confidential: To Be Opened by Addressee only" and placed in the finance lockbox or hand-delivered.

Reprisal Protection

DMS encourages those who believe they have information relating to possible criminal offenses or violations of DMS policy to report to the Treasurer (as described herein) or to other officers or Board members as they see fit, prior to engagement with outside officials.

Any reprisal against someone who in good faith reports a suspected act of misconduct or provides to a law enforcement official, acting in the performance of their duty, any truthful information relating to the commission or possible commission of a criminal offense or any other possible violation of DMS policy, is a violation of this policy and will subject the respriser to disciplinary action.

DMS prohibits the knowing destruction, alteration, mutilation, or concealment of any record, document, or tangible object with the intent to obstruct or influence the investigation or proper administration of any matter within the jurisdiction of any department or agency of the United States government, local or state law enforcement, or in relation to or contemplation of any such matter or case.