

POLICY ON FRAUDULENT ACTIVITIES / WHISTLE BLOWER

This policy is established to protect the assets and interests of Opportunities, to increase overall fraud awareness, and to ensure a coordinated approach toward resolution of financial fraud.

POLICY

Opportunities must identify and promptly investigate all instances and allegations of fraudulent activities regarding agency funds, documents, and equipment involving staff, volunteers, vendors, or other parties. Good business practice dictates that suspected defalcation, misappropriation or other fiscal irregularities be promptly identified, and investigated. We believe that it is everyone's responsibility to report any possible fraudulent activity.

All persons found to have committed fraud relevant to Opportunities financial affairs shall be subject to punitive action, and investigation by law enforcement agencies when warranted.

Fraud in any form will not be tolerated. This policy applies to all.

SCOPE AND DEFINITION OF FRAUD

Fraud generally involves a willful or deliberate act with the intention of obtaining an unauthorized benefit, such as money or property, by deception or other unethical means. All fraudulent acts are included under this policy and include such things as:

- Embezzlement, misappropriation or other financial irregularities
- Forgery or alteration of documents (checks, time sheets, contractor agreements, purchase orders, other financial documents, electronic files)
- Improprieties in the handling or reporting of money or financial transactions
- Misappropriation of funds, securities, supplies, inventory, or any other asset
- Authorizing or receiving payment for goods not received or services not performed
- Authorizing or receiving payments for hours not worked

IMPLEMENTATION

The Board of Directors, or the C.E.O. with Board oversight, issued the following guidelines to implement this policy and shall revise them as appropriate.

1. On an annual basis, a risk assessment shall be conducted and the results will be reported to the Board's Finance Committee. The risk assessment shall examine the points in the recommendations set forth by the agency's Auditors in the December 31, 2004 report, at a minimum.
2. The employees and volunteers shall, on an annual basis, be reminded of the expectation that they shall conduct themselves in a professional and totally ethical manner at all times, as it concerns all Opportunities business and financial affairs.
3. Employees and volunteers can report any real suspicion or evidence of any fraudulent activity on the part of any employee or volunteer of Opportunities to their Department Director or the Chief Executive Officer. Such report shall be guaranteed by the Department Director and Chief Executive Officer as being above any risk of personal exposure or retribution to the employee so reporting. At any time, any employee or volunteer may also contact either the Chair or the Treasurer of the Board of Directors, on an anonymous basis if desired, to report

- any real suspicion or evidence of any fraudulent activity on the part of any employee or volunteer of Opportunities. Such report shall be guaranteed by the Board of Directors as being above any risk of personal exposure or retribution to the employee so reporting. The Chair or the Treasurer may be contacted outside the agency, at home or by mail, as need be. The names and contact information shall be available to employees through the OppNet.
4. Upon receipt of such a report, the Chair shall be able to convene a meeting of the Finance Committee, which is thus empowered to authorize such investigation as they may deem appropriate to either establish or refute the employee's or volunteer's claims. The results of the investigation shall be communicated to the Board as soon as possible, and in Executive Session. The Board must take appropriate actions as a result of the Finance Committee's findings, after due consideration by the Board. Any and all actions can be taken so long as they fall within the powers of the Board of Directors as set forth in the agency's By-Laws and according to the Not-For-Profit corporation laws of the State of New York.