AMVETS Department of Florida Financial Policy

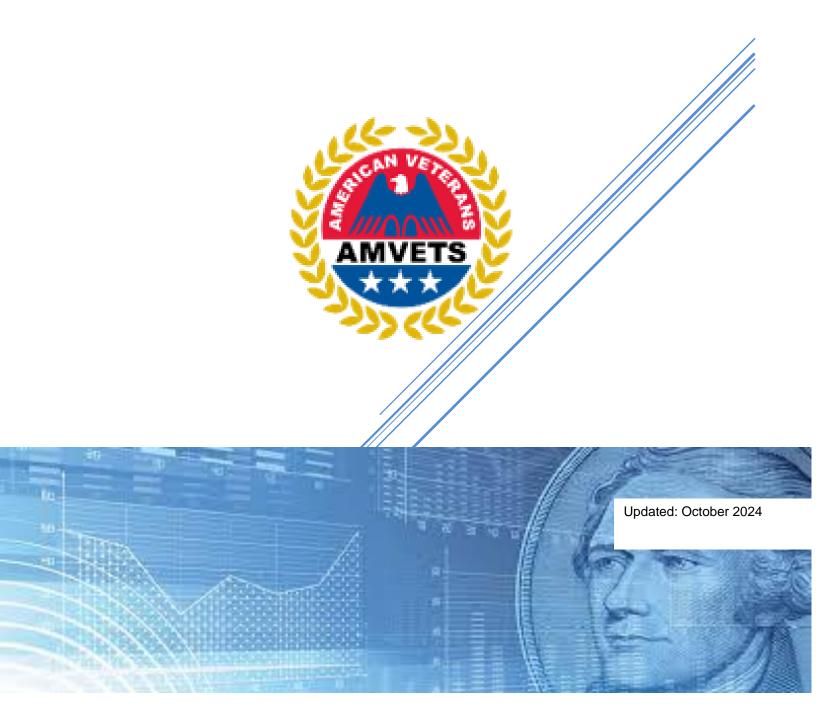


TABLE OF CONTENTS

ARTICLE I. INTRODUCTION	. 2
ARTICLE II. ORGANIZATIONAL STRUCTURE	2
ARTICLE III. COMPLIANCE WITH REGULATIONS	3
ARTICLE IV. FISCAL YEAR	3
ARTICLE V. BUDGET	3
ARTICLE VI. BANK ACCOUNTS	4
ARTICLE VII. RESERVE ACCOUNTS	4
ARTICLE VIII. INVESTMENT ACCOUNTS	
ARTICLE IX. REVENUE	. 5
ARTICLE X. MEMBERSHIP DUES	. 6
ARTICLE XI. SOLICITATIONS REVENUE	
ARTICLE XII. DISBURSEMENTS	. 8
ARTICLE XIII. FINANCIAL REPORTING	. 9
ARTICLE XIV. CONTRACTS AND FINANCIAL COMMITMENTS	11
ARTICLE XV. AUDIT COMMITTEE AND ANNUAL FINANCIAL REVIEWS	11
ARTICLE XVI. DOCUMENT RETENTION AND DESTRUCTION POLICY	12
ARTICLE XVII. CONFLICTS OF INTEREST	13
ARTICLE XVIII. WHISTLEBLOWER POLICY	. 14
ARTICLE XIX. INSURANCE POLICIES	15
ARTICLE XX. RESPONSIBILITY OF THIS POLICY	15

AMVETS Department of Florida FINANCIAL POLICY

ARTICLE I. INTRODUCTION

The AMVETS mission is to enhance and safeguard the entitlements for all American Veterans who have served honorably and to improve the quality of life for them, their families, and the communities where they live through leadership, advocacy and services. The values inherent in a successful and vibrant veteran's nonprofit, 501-C-19, organization, are:

- A. Commitment to those who have served and are serving.
- B. Transparency, integrity and honesty.
- C. Commitment beyond the law.
- D. Responsible stewardship of resources; and
- E. Commitment to excellence and maintaining the public trust.

Given its mission and stated values, AMVETS Department of Florida has adopted a Financial Policy to guide its Department Executive Committee and Finance Committee in carrying out this responsibility.

ARTICLE II. ORGANIZATIONAL STRUCTURE

The Organizational Structure of the AMVETS is 3311 Hubbard Rd., Hyattsville, MD 20785. There are 42 departments (States). AMVETS Department of Florida, Inc. has 73 posts located throughout the State of Florida. Each post is incorporated with their post number and file a separate IRS Form 990 as well as the Department Headquarters.

AMVETS Department of Florida, Inc. is registered with the State of Florida Department of Revenue, as a tax-exempt organization, and has been issued a Consumers Certificate of Exemption Number. The Organization is registered with the Internal Revenue Service as a Veterans Service Organization with designee 501 (c) 19 Corporation. There are 73 posts that are subordinate to the Headquarters.

The AMVETS Department of Florida has one employee, an Executive Director. The Executive Director reports directly to the Department Commander. The Executive Director has a job description, job evaluation form and receives annual evaluations utilizing the evaluation form. The Executive Director is a probationary position for the first 180 days receiving evaluations every 60 days.

AMVETS Department of Florida Service Foundation, Inc. is a subordinate organization of the AMVETS Department of Florida, Inc. They are incorporated, have their own tax identification number and file a separate IRS Form 990.

AMVETS Department of Florida, Inc. headquarters at 1598 Ruckel Drive, Niceville, FL

32578. Per the AMVETS Department of Florida Constitution and Bylaws, the official headquarters office is the home of the Executive Director.

ARTICLE III. COMPLIANCE WITH REGULATIONS

Compliance with this policy is mandatory for all AMVETS Department of Florida elected, appointed and volunteer officers handling funds of any type. This policy does not conflict with the AMVETS Constitution and Bylaws (CBL), Department of Florida Constitution and Bylaws nor the National Officer's Manual. These financial policies and procedures shall be implemented at all times consistently with the organization's bylaws.

ARTICLE IV. FISCAL YEAR

The fiscal year of AMVETS Department of Florida is July 1 through June 30.

ARTICLE V. BUDGET

A. **Budget Calendar:** The budget year shall be the same as the fiscal year of the organization.

B. Budget Process:

- Provisional Budget: In determining the provisional budget, revenue will be based on last year's actual numbers with tangible assumptions and realistic and/or proven income projections. The expenses will be based on last year's actual numbers and adjusted for projected inflation. A contingency budget line will be developed solely to address unexpected expenses or unforeseen losses in revenues.
- 2. **Presentation of the Provisional Budget:** The Department Finance Committee will submit a provisional annual budget to the Department Executive Committee prior to the conclusion of the February/March SEC. Within 30 days thereafter, the Department Commander may submit recommendations for budgetary change.
- 3. Board Action: The Department Executive Board may adopt or reject such recommendations by majority vote. Once finalized the provisional budget will become the annual budget. The Finance Committee will submit the annual budget to the Department Executive Board at the preconvention meeting for approval. The Finance Committee will submit the approved annual budget to the delegates on the floor at the Department Convention in June.
- 4. Administration of the Budget: The Finance Officer shall submit monthly updates to the Department Commander, Executive Director and Finance

Committee Members. The Finance Committee will review the budget during the June Convention, Fall SEC and Spring SEC, ensure it is accurate and submit to the membership with their recommendation for approval or rejection.

ARTICLE VI. BANK ACCOUNTS

- A. **Creation.** AMVETS Department of Florida shall maintain such bank accounts and investments as consistent with the organization's investment policy and as authorized by the Executive Board from time to time. All accounts will include the Department Commander, Department Executive Director and the Finance Officer. All checking, savings and investment accounts must be approved for recommendation by the Finance Committee with final approval of the membership bodies.
- B. **Reconciliation**. Monthly account statements shall be sent to a certified public accounting firm where no employee has any signatory authority of AMVETS accounts or investments. Promptly upon receipt of the monthly account statement, an employee of the certified public accounting firm shall reconcile the bank account transactions and ending balance with the financial records of the organization reporting their findings to the Finance Officer and Department Executive Director.
- C. **Signature Authority.** The following individuals have signatory authority on AMVETS bank accounts:
 - 1. The Department Commander (Elected Position)
 - 2. The Department Executive Director (Employee)
 - 3. The Department Finance Officer (Elected Position)
- D. **Signature Requirements.** The Department of Florida requires 2 signatures on each check written regardless of the amount. Signature stamps may only be used in rare instances when immediate payment is due. A log record of any check with a signature stamp must be recorded showing the date, check number, pay to the order of, the amount and the reason payment had to be made. A copy of the check will suffice.
- E. **Transfer of Funds.** Funds transferred to or from investment accounts may only be done with recommendation by the finance committee and final approval by the membership. Routine transfers between savings accounts and checking account may be done by the finance officer.
- F. **Reconciliation.** Any employee who is authorized to handle the bank reconciliations does not have authority nor access to sign checks, handle deposits/withdrawals nor has access to check signing plates, machines, facsimiles, stock, printing materials, etc."

ARTICLE VII. RESERVE (Contingency) ACCOUNTS

- A. **Department Executive Board Action.** AMVETS Department of Florida may maintain a reserve (contingency) account in such amounts as are recommended by the Finance Committee and approved by the membership. The Department Executive Board shall keep detailed records of all reserve transactions, with board minutes recorded by the Adjutant reflecting membership approval of any and all transfers of reserve funds either into or out of the account.
- B. **Purpose of Reserve (Contingency) Accounts.** AMVETS should maintain sufficient reserves (contingency) in either its bank account or in its investments to pay for expenses that may be required if the organization had to wind down its affairs or if its income stream is reduced but necessary operating expenses continue to be incurred.

ARTICLE VIII. INVESTMENT ACCOUNTS

- A. **Introduction.** AMVETS Department of Florida, from time to time, has funds that exceed its monthly expenses. Rather than leave those funds in a checking account, AMVETS desires to invest a portion of the funds in a conservative manner. This policy sets forth AMVETS Department of Florida investment philosophy.
- B. **Investment Objectives.** The investment portfolio has the purpose of preserving assets while maximizing the total rate of return. Investment assets are to be managed with diversification and little risk.
- C. **Guidelines for Investments.** All guidelines apply at time of purchase. Any mortgage backed or asset back securities or state or local securities must be rated A or higher by Standards and Poor's or by Moody's
- D. Certificates of Deposits or other Bank instruments that are insured by FDIC are permitted.
- E. Conservative investments with minimal risk are permitted.
- F. Recommendation by the Finance Committee and approval by the Membership must be obtained before any purchase is made.

ARTICLE IX. REVENUE

A. **General.** All organizational receipts for deposit shall be sent monthly to the certified public accounting firm, for entry into the Department QuickBooks Accounting system.

- B. Recognition of Income. Revenue will be recognized over the period to which it relates. Such amounts earned, but not received, will be reported as receivable. Such amounts received, but not earned, will be reported as deferred revenue. Membership fees are non-refundable and shall be recognized as income upon receipt. Revenue restricted by donors or other outside parties will be reported as an increase in unrestricted net assets if a restriction expires in the year in which the revenue is recognized. All other restricted revenue will be reported as an increase in temporarily restricted net assets. This information will be verified and recorded in QuickBooks.
- C. Accounts Receivable. All receivables shall be treated as fully collectible. Accordingly, no allowance for doubtful accounts is required. If accounts become uncollectible, they will be charged to operations when that determination is made.
- D. Checks. All checks shall be restrictively endorsed immediately upon receipt whether by the Finance Officer or Executive Director with the notation, "For Deposit Only, [Bank Name], [Account Number]." Copies will be made of all checks received and they, together with any corresponding invoices to which they pertain, will be maintained by the Finance Officer and reviewed monthly by certified public accounting firm.
- E. **Cash.** All receipts of cash will be accompanied by the issuance of a cash receipt by the Finance Committee or Finance Officer. The cash receipts shall be sequentially numbered and indicate the amount received, the purpose of the receipt, and be signed by the individual who received the cash on behalf of the organization. The cash transactions will be verified and recorded in QuickBooks.
- F. Deposits. All funds received for deposit shall be promptly recorded and deposited into the organization's checking account within a week of receipt. Deposits shall be made intact and cash shall not be returned back upon deposit. All Deposits will be verified and recorded in QuickBooks.

ARTICLE X. MEMBERSHIP DUES

A. **Dues Amounts.** The main revenue of this Department shall be derived from the membership fees and dues of the members of the Posts in the Department, and such other sources consistent with the provisions of the National Constitution and Bylaws. AMVETS dues (annual membership) in any Post within the Florida AMVETS shall be thirty-five dollars (\$35.00), of which fifteen dollars (\$15.00) shall be forwarded to the National Organization, ten dollars (\$10.00) remains with this Department and ten dollars (\$10.00) stays at the Post. MAL dues shall be thirty-five dollars (\$35.00), of which fifteen dollars (\$15.00) shall be forwarded to the National Organization, five dollars (\$5.00) placed in an advertisement fund for the Department, and the

remaining fifteen dollars (\$15.00) remains with this Department. In the case of life membership, the minimum rate shall be established by the National Constitution and Bylaws. Currently, the life membership dues shall be not less than \$500 for those members age up to and including 55, ages 56 through and including 65 will be \$400 and those 66 and over \$300.

B. Dues Payments:

- 1. Online Membership Processing: Active posts may pay their dues fees online. When making the payment online the cost is \$25.00 annually, per member with the post retaining \$10. The National Headquarters receives the credit card payment and once a month issues a Refund Report reflecting the members that dues were paid by an active post online and the amount owed to the Department.
- 2. Members may pay their dues online without using the post. In this case they pay a total of \$35.00 annually. National receives the credit card payment and on the refund report it reflects that they owe \$10.00 to both the post and the Department.
- 3. Member may join as a life member at the post. Rates are covered in Paragraph A. above. Fifty percent will be paid to National Headquarters, 25% will be the post share and 25% will be the department share.
- 5. An Annual member converts to a life member at the post. He/She pays the rates above in paragraph 3 less the \$35 annual fee already paid. That means the National portion will be decreased by \$15.00, Department and Post reduced by \$10.00 each.
- C. Dues Accountability: The certified public accounting firm will verify and record all of the membership revenue and expenses based on the specific dues payments shown above.

ARTICLE XI. SOLICITATIONS REVENUE

AMVETS Department of Florida receives a small part of the revenue with the solicitation done by Front Line Support, LLC. The contractual agreement gives the AMVETS Department of Florida, Inc. a percentage of the donations taken in. There are two types of donations received from the contractual agreement:

- A. Check Revenue: Donors write checks and send them directly to Front Line Support, LLC. These checks are deposited into our checking account at Wells Fargo Bank. A weekly statement is emailed with the amounts deposited that is verified by the Wells Fargo Bank Statement.
- B. Credit Card Revenue: The AMVETS Department of Florida, Inc. has an agreement with Wells Fargo Merchant Services. Credit card payments from solicitations are processed by World Pay and transferred to our checking

account. These are identified on the emailed document from Front Line Support LLC. These deposits are checked on the monthly bank statements by the Executive Director and sent to the certified accounting firm for reconciliation and posting into the QuickBooks accounting system.

ARTICLE XII. DISBURSEMENTS

- A. **Disbursements.** Except as provided in the section below pertaining to Debit Cards, all disbursements shall be made by pre-numbered checks.
- B. Disbursement Vouchers. Payments for reimbursement of qualified expenses will be made in accordance with the Department of Florida Reimbursement Policy. No reimbursement can be made without receiving a valid voucher request. Documentation shall be prepared for each invoice or request for reimbursement that details the date of the check, check number, payee, amount of check, and description of expense account(s) to be charged. Invoices or accompanying receipts will be attached as backup to the check stub.
- C. Checkbook. AMVETS Department of Florida, Inc. shall maintain the organizational checkbook. Signatories to the organizational checking account shall be the Commander and Finance Officer. All individuals with signatory authority must be authorized by appropriate resolution of the Department Executive Board.
- D. Check Preparation and Issuance. The AMVETS Department of Florida, Inc. shall be responsible for preparing and processing all checks to vendors. The Department Finance officer will prepare the check for payment. The Department Commander will verify the check and invoice and be the second signature on the check.
- E. **Disbursement Authorization.** The Finance Officer and Department Commander are authorized to make payments from the operating account for expenses within the approved budget up to and including \$10,000. Payments for unbudgeted expenses and payments for budgeted expenses above \$10,000 must be authorized by the Department Executive Board.
- F. **Debit/Credit Cards.** The organization may maintain debit cards to allow debit transactions on the organization's checking account. Use of organization debit cards shall be strictly limited to payment of legitimate expenses of the organization. In no event shall a debit card be used as an ATM card or otherwise to obtain cash. To the extent reasonably possible, all debit/credit card users shall notify the Finance Officer of anticipated uses of the debit cards so sufficient funds can be transferred into the organization's checking account to cover future debit transactions. As soon as practicable, but no later than ten business days following the use of a debit card, the debit card user shall send supporting documentation for each debit card transaction to the Finance Officer for forwarding to the

- Management Company.
- G. **Expense Verification.** Before signing any check, all check signatories shall review invoices and supporting documentation to verify that it is a legitimate expense of the organization. The Finance Officer shall verify vendor invoices for accuracy in quantities ordered and received, prices charged, and overall clerical accuracy. All paid invoices and supporting documentation shall be stamped "paid" to avoid duplicate payment and shall include the date of payment and number and amount of the check. Invoices from unfamiliar or unusual vendors shall be reviewed and approved by the Finance Officer before payment.
- H. Expense Reimbursements. Requests for reimbursement of expenses incurred by organization officers, directors or members on behalf of the organization shall be in accordance with the AMVETS Department of Florida Reimbursement Policy. All submissions shall be checked for mathematical accuracy and reasonableness before approval. All requests for reimbursement shall be supported by receipts or other appropriate documentation and shall include a statement of the purpose for which the expense was incurred.
- I. **No Cash Transactions.** Checks shall not be made out to "cash" nor shall checks be signed in blank.
- J. Voided Checks. Voided checks shall be defaced and kept on file.
- K. Prepaid Expenses. Expenses related to meetings and conferences to be held in future periods will be classified as prepaid expenses and will be recognized as expenses in the period during which the meeting or conference occurs.
- L. **Estimates.** Major purchases cannot be made without having a minimum of 2 estimates with a preference of three. The purchase should be made to the least expensive estimate, as long as the quality and conditions are relatively the same. Major purchases must be approved by the Finance Committee to ensure proper funds are available.
- M. **Unpaid Invoices:** Unpaid invoices shall be maintained in an unpaid invoice file.

ARTICLE XIII. FINANCIAL REPORTING

- A. **Chart of Accounts.** The organization's financial reporting will be consistent with a Chart of Accounts created in QuickBook Accounting System.
- B. **General.** The AMVETS Department of Florida, Inc. along with a certified public accounting firm, shall create and maintain all financial books and records. All such books and records shall be open to review by the members of the Department Executive Board, and other authorized agents of the organization at all times.

- C. Monthly Financial Reports. On a monthly basis as soon as practicable after receipt of the monthly bank account statement and reconciliation of the internal financial records to the bank account statement, the AMVETS Department of Florida, Inc. shall provide to the certified public accounting firm all of the bank statements, credit card statements and Front Line Support Statements who in turn will provide the Executive Director and Finance Officer the following reports, who shall, in turn, promptly report in writing on the state of the organization's finances to the board:
 - 1. A Statement of Activities showing monthly financial activity and reflecting beginning account balances, a detailed list of all cleared checks and other debits, a detailed list of all cleared deposits and other credits, ending account balances, a detailed list of all outstanding but uncleared debit or credit transactions, and ending book balances. In addition, the monthly Statement of Activities shall report year-to-date financial activity and show variances compared to the annual budget. The Finance Officer shall, after reviewing the same, cause the monthly Statement of Activities to be forwarded to all officers and directors of the organization to be considered as part of the agenda of the next meeting of the board.
 - 2. A copy of the monthly bank statement reflecting all checking account and other account activity, and any other monthly statements pertaining to the deposit or investment of organization funds.
 - 3. Documentation shall be maintained of all checks or other documents resulting in the debit of funds from any organization financial account. Documentation shall be maintained of all deposits or transfers of funds into any organization financial account. The Executive Director and Finance Officer shall be provided with all information relating to deposits and debits on a monthly basis accompanying the monthly bank reconciliation.
 - 4. A Reconciliation Detail report showing the reconciliation between the check register and the monthly bank statement.
- D. **Annual Financial Reports.** On an annual basis as soon as practicable after receipt of the monthly bank account statement for the twelfth month of the fiscal year, the certified public accounting firm shall provide to the Finance Officer and Executive Director the following reports:
 - 1. Annual Profit and Loss Statement showing income and expenses by budget category.
 - 2. End of Year Balance Sheet showing all organizational assets and liabilities as of the last day of the fiscal year; and the Finance Officer or Executive Director shall cause copies of all annual financial reports to be provided promptly to all members of the board.
- E. **Publication of Annual Financial Reports.** Annual financial reports of the organization shall be made available to any member who requests

- the same. The annual financial reports shall be posted in the members' area of the organization's website.
- F. **Other Financial Reports.** The Department of Florida Finance Officer shall provide financial reports of all member meetings, including preliminary budgets and interim and final reports of income and expenses.
- G. Form 990 reporting. AMVETS Department of Florida, Inc. shall be responsible for supplying such financial records to the certified public accounting firm as are necessary for the timely filing of the organization's annual IRS Form 990. The Executive Director and Finance Officer will review and sign the 990 when it is ready to be filed.

ARTICLE XIV. CONTRACTS AND FINANCIAL COMMITMENTS

- A. **Board Authority.** No member, employee, volunteer, agent, independent contractor or other representative of the organization shall bind the organization to any contract Involving a financial commitment of the organization except upon the recommendation of the Department Judge Advocate and authorization of the Department Executive Board, recorded in the minutes.
- B. **Signed Contracts.** All written contracts between the organization and any vendor or other provider of goods or services to the organization or its membership shall be signed on behalf of the organization by the Commander or the Executive Director only after approval of the Department Judge Advocate.

ARTICLE XV. AUDIT COMMITTEE AND ANNUAL FINANCIAL REVIEWS

- A. Audit Committee. Bi-annually the Department Commander will appoint 2 State Executive Committeemen independent of any financial / treasury function to perform an internal audit of the Department of Florida books. The Executive Board shall act as an Audit Committee to fulfill its oversight responsibilities with respect to the audit of the organization's books and financial records and ensure a system of internal controls that the organization has established. The board shall annually hire an independent external auditor to review the financial records.
- B. **Audit Committee Responsibilities.** The Audit Committee's responsibilities may include:
 - 1. Acting as liaison to the organization's external auditor.
 - 2. Selection and review of the independent external auditor and review of the annual fees to be paid for services rendered by the external auditor

- and each proposed audit plan developed by management and the external auditor.
- 3. Review with the independent external auditor of the organization's annual financial statements and reports.
- 4. Review and evaluation of the management letter (if any) received from the independent external auditor and discussion of recommendations for any changes necessary to remedy problems identified in the letter.
- 5. At the completion of the audit, review the audit fieldwork process with the auditor. Obtain an understanding of the auditor's evaluation of management and whether the auditor encountered any difficulties or had any disagreements with management during the audit. Review all journal entries proposed by the auditors.
- Interact with the Department to implement and monitor the internal control structure and to take steps to ensure that the possible risks of fraud or embezzlement are mitigated.
- 7. Ensure that proper federal and state tax filings are completed in a timely manner.
- 8. Understand the organization's internal controls and use this policy to update them as needed.
- 9. Periodically review the organization's insurance coverage and determine its adequacy.
- Make recommendations necessary to improve the organization's efficiency and/or remedy problems identified by the committee or others.
- 11. Identify and monitor related party transactions and review the conflict of interest, ethics and related party disclosure policies periodically and update as needed.
- 12. Monitor any legal matters that could impact the financial health and reporting of the organization.
- 13. Institute and oversee any special investigatory work as needed.
- C. **Access to Records.** The Department Finance Officer shall cooperate by providing the outside auditor access to such books and records of the organization as are necessary to carry out the audit function.

ARTICLE XVI. DOCUMENT RETENTION AND DESTRUCTION POLICY

This <u>Document Retention and Destruction Policy</u> of AMVETS Department of Florida, Inc. identifies the record retention responsibilities of members of the Department Executive Board, and administrative and service providers for maintaining and documenting the storage and destruction of AMVETS documents

and records.

A. **Rules**. AMVETS Department Executive Board, and administrative and accounting service providers are required to honor these rules: (a) paper or electronic documents indicated under the terms for retention below will be transferred and maintained by AMVETS administrative service provider or its equivalents; (b) all other paper documents may be destroyed after three years; (c) all other electronic documents may be deleted from all individual computers, data bases, networks, and back-up storage after one year; and (d) no paper or electronic documents will be destroyed or deleted if pertinent to any ongoing or anticipated government investigation or proceeding or private litigation.

B. Terms for retention.

1. To be retained **permanently**:

- (a) Governance records Charter and amendments, Bylaws, other organizational documents, governing board and board committee minutes.
- (b) Tax records Filed state and federal tax returns/reports and supporting records, tax exemption determination letter and related correspondence, files related to tax audits.
- (c) Intellectual property records Copyright and trademark registrations and samples of protected works.
- (d) *Financial records* Audited financial statements, attorney contingent liability letters.

2. To be retained for three years:

- (a) Lease, insurance, and contract/license records Software license agreements; vendor, hotel, and service agreements; independent contractor agreements; employment agreements; consultant agreements; and all other agreements (retain during the term of the agreement and for three years after the termination, expiration or non-renewal of each agreement).
- (b) Correspondence files, past budgets, bank statements, publications, employee manuals/policies and procedures, survey information.

3. To be retained for one year:

(a) All other electronic records, documents and files.

4. **Exceptions**. Exceptions to these rules and terms for retention may be granted only by the Department Commander or Department Executive Director.

ARTICLE XVII. CONFLICTS OF INTEREST

Elected and Appointed Officer of the organization shall not have any personal or business interest that may conflict with their responsibilities to the organization. In the event any matter comes before the Department Executive Board for action concerning which an elected or appointed officer or any member of their family has a personal or business interest, the elected or appointed officer shall fully disclose the same and shall not participate in any consideration of or decision related to the matter. The minutes shall reflect the disclosure and non- participation. Conflict of Interest forms are attached as Appendix A. Each year after the annual elections, all elected and appointed officers must fill one out and return to the Executive Director.

ARTICLE XVIII. WHISTLEBLOWER POLICY

- A. This Whistleblower Policy of AMVETS:
 - 1. encourages members, officers, directors and administrative and/or accounting service providers to come forward with credible information on illegal practices or serious violations of adopted policies of AMVETS.
 - 2. specifies that AMVETS will protect the person from retaliation; and
 - 3. identifies where such information can be reported.
- B. Encouragement of reporting. AMVETS encourages complaints, reports or inquiries about illegal practices or serious violations of AMVETS policies, including illegal or improper conduct by AMVETS itself, by its leadership, or by others on its behalf. Appropriate subjects to raise under this policy would include financial improprieties, accounting or audit matters, conflicts of interest, ethical violations, or other similar illegal or improper practices or policies.
- C. Protection from retaliation. AMVETS prohibits retaliation by or on behalf of AMVETS against members, officers, directors and administrative and/or accounting service providers making good faith complaints, reports or inquiries under this policy or for participating in a review or investigation under this policy. This protection extends to those whose allegations are made in good faith but prove to be mistaken. AMVETS reserves the right to take appropriate action against persons who make bad faith, knowingly false, or vexatious complaints, reports or inquiries or who otherwise abuse this

policy.

D. Where to report. Complaints, reports or inquiries may be made under this policy on a confidential or anonymous basis. They should describe in detail the specific facts demonstrating the bases for the complaints, reports or inquiries. They should be directed to the Department Commander. If this person is implicated in the complaint, report or inquiry, it should be directed to the Executive Director. AMVETS will conduct a prompt, discreet, and objective review or investigation. AMVETS may be unable to fully evaluate a vague or general complaint, report or inquiry that is made anonymously.

ARTICLE XIX. INSURANCE POLICIES

- I. **Board Notice.** AMVETS must meet the requirements of the CBL to carry liability insurance and have the National Headquarters reflected on the CERTIFICATE HOLDER BLOCK of the Acord 25 insurance form. The Department must ensure that the payment is made in time.
- II. **Directors and Officers Insurance.** AMVETS shall maintain directors and officer's insurance in the minimum amount of \$1,000,000 with a \$500.00 deductible, assuming that it is not cost prohibitive.
- III. **Crime Policy.** AMVETS shall purchase a crime policy in the amount of \$100,000 with a \$250 deductible. This will provide protection against any internal theft. Also included in this theft policy should be a clause to provide for information recovery. This will protect against someone deleting information from a computer and having that same information recovered.
- IV. **Liability Insurance.** AMVETS shall have a general liability insurance policy in accordance with the CBL. This liability insurance must provide satisfactory coverage at the SEC and Convention hospitality suites.
- V. Annual Insurance Review. On an annual basis, the Department Executive Board shall provide a review of the insurance policies and make recommendations on whether there should be any changes to the policies. The Board shall make the determination as to which policies shall be maintained.

ARTICLE XX. RESPONSIBILITY OF THIS POLICY

Responsibility for this policy relies with the AMVETS Department of Florida, Inc. Finance Committee. Any changes, additions or deletions will be recommended by the Finance Committee and approved by the Membership. Changes to this policy may be made at any SEC or Convention.

APPENDIX A

OFFICER/DIRECTOR/BOARD MEMBER CONFLICT OF INTEREST STATEMENT

This is to certify that, to the best of my knowledge, except as described below, I am not now, nor at any time in the past, have been:

- 1. A participant, directly or indirectly, in any material arrangement, agreement, investment, or other activity with any vendor, supplier, or other party doing business with AMVETS, which could result in personal benefit to me.
- Material recipient, directly or indirectly, of any compensation, loans, gifts of any kind, or any free services, discounts, or other fees from, or on behalf of AMVETS or any person or organization engaged in any transactions with AMVETS.

Any exceptions to #1 or #2 above are stated below with a full description of the transactions and of the interest, whether direct or indirect, which I have, or had in the past year, in persons or organizations having transactions with AMVETS:	
Please Print Name and Title:	
	Date
Signature	