

FRAUD PREVENTION POLICY

TOWN OF WILMINGTON

PURPOSE. The purpose of this policy is to provide a mechanism for employees and officers to bring to the attention of the Town Manager or Selectboard Chair any complaints regarding the integrity of the Town's internal financial controls or the accuracy or completeness of financial or other information used in or related to the Town's financial statements and reports. Town employees and officers shall not be discharged, demoted, suspended, threatened, harassed, or discriminated against in any manner for raising reasonable questions concerning the fair presentation of Town financial statements in accordance with this policy.

REPORTS OF IRREGULARITY. Any employee who has a complaint regarding the integrity of the Town's internal financial controls or the accuracy or completeness of financial or other information used in or related to the Town's financial statements and reports, or who observes any questionable accounting practices, should report such complaint first to the Town Manager. In the event the Town Manager is the subject of the complaint it shall be reported to the Selectboard Chair.

The report should include a description of the matter or irregularity, the period of time during which the employee observed the matter or irregularity, and any steps that the employee has taken to investigate the matter or irregularity, including reporting it to a supervisor and the supervisor's reaction. The report may include, at the employee's option, the employee's contact information if additional information is needed. However, a report shall not be deemed deficient because the employee did not include contact information, including the name of the employee

Examples of reportable actions include any indication of fraud, misappropriation of Town resources, substantial variation in the Town's financial reporting methodology from prior practice or from generally accepted accounting principles, and the falsification, concealment, or inappropriate destruction of Town financial records.

General questions related to the finances of the Town, and not related to any irregularity may be posed to the Finance Officer.

INVESTIGATION. Upon receiving such a report, *the Town Manager* shall investigate the issues identified in the report. The *Town Manager* shall consult with the Selectboard, Finance Officer, any other Town employee, officer, legal counsel, independent auditors, or any other person or entity as part of their investigation. At the conclusion of the investigation, the *Selectboard* shall prepare a written response to the report, which shall be a public document. In the event the Town Manager is the subject of the complaint it shall be filed with the Selectboard Chair, and the Selectboard shall determine the best course of action to initiate an investigation.

In accordance with 24 V.S.A. § 1686(c), any town officer who willfully refuses or neglects to submit their books, accounts, vouchers, or tax bills to the public accountant after five business days following their receipt by certified mail of a written request that is approved and signed by the legislative body, or to furnish all necessary information in relation thereto, shall be ineligible for reelection for the year ensuing and be subject to the penalties otherwise prescribed by law.

The foregoing Policy is hereby adopted by the Selectboard of the Town of Wilmington, Vermont, this 18th day of March and is effective as of this date until amended or repealed.

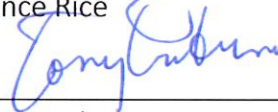
Selectboard Members



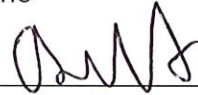
Thomas Fitzgerald



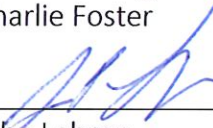
Vince Rice



Tony Tribuno



Charlie Foster



John Lebron