

Whistleblower Policy

[COMPANY]

Purpose

The purpose of this whistleblower policy is to ensure the employees, officers, and directors of [COMPANY] (the "Organization") observe high standards of business and personal ethics in the conduct of their duties and responsibilities. This policy is intended to supplement but not replace any applicable state and federal laws governing nonprofit and charitable organizations. Accordingly, this policy statement is intended to guide both the Board of Directors and staff regarding ethical and legal compliance.

Reporting Responsibility

All directors, officers and employees are required to report any and all violations or suspected violations of business and personal ethical standards and/or applicable legal requirements in accordance with this Whistleblower Policy. The matters which should be reported under this policy include, but are not limited to, suspected fraud, theft, embezzlement, accounting or auditing irregularities, bribery, kickbacks and misuse of the Organization's assets or personnel.

This policy is not a vehicle for reporting violations of the Organization's applicable human resources policies, problems with coworkers or managers, or for reporting issues related to alleged employment discrimination or sexual or any other form of unlawful harassment, all of which should be dealt with in accordance with the Organization's employee policies.

Reporting Procedures

If an employee reasonably believes that any person associated with the Organization is engaging in or plans to engage in a violation of any applicable legal, regulatory, or ethical standard, the employee must immediately report his or her concern pursuant to this Whistleblower Policy. The employee should first report the concern to his or her immediate supervisor, or, if the issue involves such supervisor (or the employee is not comfortable discussing the matter with the supervisor), to the [EXECUTIVE TITLE]. If the employee is not satisfied with the resolution at this point, the employee may contact the Board of Directors.

Any complaints of wrongdoing regarding the [EXECUTIVE TITLE] shall be reported directly to one or more members of the Board of Directors.

The [EXECUTIVE TITLE] shall report any whistleblower complaints to the Board of Directors, shall report on how such complaints are being handled, and shall subsequently report when and how each complaint is resolved. The Board of Directors may decide that any such complaint should be investigated and resolved by the Board of Directors or other duly authorized Committee of the Board of Directors rather than by management. In addition, the Executive Committee or other duly authorized Committee of the Board of Directors shall investigate and resolve any complaints of wrongdoing by the [EXECUTIVE TITLE].

Any complaints of wrongdoing received by an officer or director of the Organization shall be reported directly to the Board of Directors, which may decide to refer such complaints to a duly authorized Committee of the Board of Directors for investigation and resolution.

Actions Under This Policy

This Whistleblower Policy is intended to encourage and enable employees and others to raise serious concerns within the Organization prior to seeking resolution outside the Organization. Supervisors must ensure that these procedures are available and known to all employees and that all employees have easy access to the mechanism for making reports.

All employees, officers, and directors have a right to be free from any adverse employment action or retaliation. Threats or other forms of intimidation or retribution against an employee, officer, or director who makes a report or participates in an investigation are prohibited. Any employee, officer, or director responsible for such threats or other forms of intimidation is subject to disciplinary action in accordance with the Organization's policies and applicable law, which may include termination. Employees, officers, or directors with complaints of retaliation should contact their immediate supervisor, the [EXECUTIVE TITLE], or the Board of Directors. The [EXECUTIVE TITLE] or the Board of Directors will promptly investigate all reports of retaliation and a determination will be made regarding corrective action if deemed necessary.

Anyone filing a complaint concerning a suspected violation of ethical or legal standards under this Whistleblower Policy must act in good faith and have reasonable grounds for believing that a violation of such standards is occurring or planned. However, any report or allegations that prove to have been made maliciously or knowingly to be false or misleading will be viewed as a serious disciplinary offense.

Confidentiality

In an effort to foster an environment where employees, officers, and directors feel free to voice their concerns, reports of suspected violations may be submitted on a confidential basis or anonymously. Reports of suspected violations will be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation.