



## **WHISTLEBLOWER POLICY**

The Community Food Share Ethics Standards/Code of Conduct policy requires directors and employees to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. Community Food Share is also committed to adhering to all laws and regulations that apply to the Agency. In line with these commitments, and Community Food Share's goal of open communications with its employees, this policy aims to provide an avenue for employees to raise good-faith concerns confidentially and without fear of retaliation. The objectives of this Whistleblower Policy are to establish policies and procedures for:

- The submission of concerns regarding questionable accounting, internal control, or audit matters;
- The receipt, retention, and treatment of such concerns received by Community Food Share; and
- The protection of employees reporting good-faith concerns from retaliatory actions.

### **Reporting Responsibility**

Each director, employee, and volunteer of Community Food Share has an obligation to report in accordance with this Whistleblower Policy complaints, reports, or inquiries about illegal practices or serious violations of this policy, including suspected illegal or improper conduct by the organization itself, by its leadership, or by others on its behalf (hereinafter referred to as "Concerns").

### **Good Faith**

Anyone reporting a Concern must act in good faith and have reasonable grounds for believing the reported action violates Community Food Share policy or the law. The act of making allegations that prove to be unsubstantiated, and that prove to have been made maliciously, recklessly, or with the foreknowledge that the allegations are false, may result in discipline, up to and

including termination of employment. Such conduct may also give rise to other actions, including civil lawsuits.

## **Reporting Procedure**

### **Employees**

To raise a Concern, employees should first discuss the issue with their Department Director or, if the conduct involves their Department Director, the Executive Director as soon as possible, but ideally within five days of learning about the concern. If, after speaking with the Department Director or Executive Director, the employee continues to have reasonable grounds to believe the Concern is valid, the employee, with the assistance of the Department Director or Executive Director, should reduce the concern to writing and submit it directly to the Finance Committee of the Board of Directors as soon as practicable.

### **Board of Directors and Other Volunteers**

Board members and other volunteers may report Concerns to in writing directly to the Finance Committee.

The Finance Committee shall be responsible for promptly investigating and making appropriate recommendations to the board of directors with respect to all reported Concerns. The chair of the Finance Committee will notify the sender and acknowledge receipt of the Concern within five business days, if possible. It will not be possible to acknowledge receipt of anonymously submitted Concerns. In addition, action taken must include a conclusion or follow-up, or both, with the complainant for complete closure of the Concern.

### **Confidentiality**

Reports of Concerns, and investigation pertaining thereto, shall be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation. The Finance Committee has the authority to retain outside legal counsel, accountants, private investigators, or any other resource deemed necessary to conduct a full and complete investigation of the allegations.

## **No Retaliation**

Community Food Share strictly prohibits and does not tolerate retaliation of any kind against an individual who in good faith reports a Concern pursuant to this Whistleblower policy. All forms of retaliation against employees making good faith reports are prohibited, including any form of discipline, reprisal, intimidation or other form of retaliation for participating in any activity protected by law or this policy.

Examples of protected activities include, but are not limited to:

- The submission of Concerns;
- The receipt, retention, and treatment of Concerns received by the Agency; and
- The protection of directors, volunteers, and employees reporting Concerns from retaliatory actions.

The examples above are illustrative only, and not exhaustive. No form of retaliation for any protected activity will be tolerated.

Employees with questions or complaints alleging a violation of this prohibition against retaliation should discuss the issue with the Executive Director or their Department Director immediately. As an option, complaints involving the Executive Director may be brought to the Chairperson of the Board of Directors.

Community Food Share will conduct a thorough and objective investigation of the retaliation complaint, making an effort to keep the matter as confidential as possible to the extent consistent with this investigation. If Community Food Share determines that retaliation has occurred, the person found to have violated this Policy's prohibitions against retaliation will be subject to disciplinary action up to and including termination. Community Food Share will take steps as necessary to prevent further retaliation.