

# Whistleblower Policy

Adopted: May 2009

## 1) Purpose

This Whistleblower Policy is designed to provide a mechanism for employees and other organization leaders to raise good faith concerns regarding suspected violations of law or WHFH policy; to facilitate cooperation in any inquiry or investigation by any court, agency, law enforcement, or other governmental body; and to protect individuals who take such action from retaliation or any threat of retaliation by any other employee or agent of WHFH.

## 2) Policy

This Policy applies to all WHFH employees, including part-time, temporary, and contract employees, as well as directors, officers, and other organization volunteers. WHFH is committed to maintaining a workplace where employees are free to raise good faith concerns regarding WHFH's business practices. Employees are encouraged to report suspected violations of the law on the part of WHFH; to identify potential violations of WHFH policy; and to provide truthful information in connection with any official inquiry or investigation.

WHFH expressly prohibits any form of retaliation, including harassment, intimidation, adverse employment actions, or any other form of retaliation, against employees or volunteers who raise suspected violations of law, cooperate in inquiries or investigations, or identify potential violations of WHFH policies. Any employee who engages in retaliation will be subject to discipline, up to and including termination.

## 3) Procedure

Reports of suspected violations of law or policy and reports of retaliation will be investigated promptly and in a manner intended to protect confidentiality. The President or his/her designate will manage such investigation, and may request the assistance of counsel or other outside parties as he or she deems necessary. The President will prepare a report of the findings of the investigation, and submit such report to the Board of Directors. In the event that a report concerns the President, they shall recuse themselves from the proceedings, and the Board of Directors shall select an appropriate officer of WHFH to continue the investigation. Any employee who believes that he or she has been subjected to any form of retaliation as a result of reporting a suspected violation of law or policy should immediately report such incident to the President or another officer.