**Sample Whistleblower Policy**

**Introduction**

The Code of Conduct adopted by THE ORGANIZATION requires all staff, board members, and volunteers to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. As employees and representatives of THE ORGANIZATION, we must practice honesty and integrity in fulfilling our responsibilities and comply with all applicable laws and regulations. Set forth below is THE ORGANIZATION’s policy with respect to reporting good-faith concerns about the legality or propriety of THE ORGANIZATION actions or plans.

**Reporting of Concerns or Complaints**

It is the responsibility of all staff, board members, and volunteers to comply with THE ORGANIZATION’s Code of Conduct and applicable law and to report violations or suspected violations in accordance with this Whistleblower Policy.

**Confidentiality**

THE ORGANIZATION will treat all communications under this policy in a confidential manner, except to the extent necessary 1) to conduct a complete and fair investigation, or 2) for review of THE ORGANIZATION operations by THE ORGANIZATION’S s board, its executive committee, THE ORGANIZATION’S s independent public accountants, and THE ORGANIZATION’S s legal counsel.

**Retaliation**

THE ORGANIZATION will not permit any negative or adverse actions to be taken against any employee or individual for making a good-faith report of a possible violation of its Code of Ethics or applicable law, even if the report is mistaken, or against any employee or individual who assists in the investigation of a reported violation. Retaliation in any form will not be tolerated. Any act of alleged retaliation should be reported immediately and will be promptly investigated. An employee who retaliates against someone who has reported a violation in good faith is subject to discipline up to and including termination of employment. 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.

**How to Report Concerns or Complaints**

Employees and others may communicate suspected violations of its Code of Conduct, applicable law, or other wrongdoing or alleged retaliation by contacting THE ORGANIZATION’S s executive director. If you wish to remain anonymous, it is not necessary that you give your name or position in any notification. Employees and others who wish to allege wrongdoing against the executive director may make a report by calling either the board president or any member of the executive committee. Whether or not you identify yourself, for a proper investigation to be conducted, please provide THE ORGANIZATION with as much information as you can, sufficient to do a proper investigation, including where and when the incident occurred, names and titles of the individuals involved, and as much other detail as you can provide.

**Illustrative Types of Concerns**

The following is a non-exhaustive list of the kinds of improprieties that should be reported:

* Supplying false or misleading information on THE ORGANIZATION’S s financial or other public documents, including its Form 990
* Providing false information to or withholding material information from THE ORGANIZATION’S s board or auditors
* Destroying, altering, mutilating, concealing, covering up, falsifying, or making a false entry in any records that may be connected to an official proceeding, in violation of federal or state law or regulations
* Altering, destroying, or concealing a document, or attempting to do so, with the intent to impair the document’s availability for use in an official proceeding or otherwise obstructing, influencing, or impeding any official proceeding, in violation of federal or state law or regulations
* Embezzling, self-dealing, private inurement (i.e., THE ORGANIZATION earnings inuring to the benefit of a director, officer, or senior management) and private benefit (i.e., THE ORGANIZATION assets being used by anyone in the organization for personal gain or benefit)
* Paying for services or goods that are not rendered or delivered
* Violating THE ORGANIZATION’S s Code of Conduct, Conflict-of-Interest Policy, Harassment Policy, or Equal Employment Opportunity Policy
* Facilitating or concealing any of the above or similar actions