

(Organization Name)

Compliance-Whistleblower Policy

This policy is adopted by (Name of Organization) to: (1) encourage staff and volunteers to come forward with credible information on illegal practices or serious violations of adopted policies of (ORGANIZATION); (2) specify that (ORGANIZATION) will protect the person from retaliation; and (3) identify where such information can be reported.

1. **Encouragement of reporting.** (ORGANIZATION) encourages complaints, reports or inquiries about illegal practices or serious violations of (ORGANIZATION)'s policies, including illegal or improper conduct by (ORGANIZATION) itself, by its leadership, or by others on its behalf. Appropriate subjects to raise under this policy would include financial improprieties, accounting or audit matters, ethical violations, or other similar illegal or improper practices or policies. Other subjects on which (ORGANIZATION) has existing complaint mechanisms should be addressed under those mechanisms. This policy is not intended to provide a means of appeal from outcomes in those other mechanisms.

2. **Protection from retaliation.** (ORGANIZATION) prohibits retaliation by or on behalf of the organization against staff or volunteers for making good faith complaints, reports or inquiries under this policy or for participating in a review or investigation under this policy. This protection extends to those whose allegations are made in good faith but prove to be mistaken. (ORGANIZATION) reserves the right to discipline persons who make bad faith, knowingly false, or vexatious complaints, reports or inquiries or who otherwise abuse this policy.

3. **Where to report.** Complaints, reports or inquiries may be made under this policy on a confidential or anonymous basis. They should describe in detail the specific facts demonstrating the bases for the complaints, reports or inquiries. They should be directed to (ORGANIZATION)'s Chief Executive Officer or the President; if both of those persons are implicated in the complaint, report or inquiry, it should be directed to the (ORGANIZATION)'s General Counsel. (ORGANIZATION) will conduct a prompt, discreet, and objective review or investigation. Staff or volunteers must recognize that (ORGANIZATION) may be unable to fully evaluate a vague or general complaint, report or inquiry that is made anonymously.

Adopted: