

North Texas Community Foundation

Whistleblower Policy

PURPOSE

It is the policy of the North Texas Community Foundation that its operations are conducted according to the highest standard of integrity, and that its officers, directors, employees, consultants, volunteers, vendors and other agents avoid situations that might conflict with their responsibilities on behalf of the Community Foundation.

WHISTLEBLOWER: DEFINITION

A whistleblower is someone who makes a good-faith communication that discloses information that may indicate an improper activity or condition. Whistleblowers are only reporting parties and not investigators or finders of fact; they do not determine appropriate remedial or corrective actions.

SCOPE

All officers, directors, employees, including temporary employees, consultants, volunteers, vendors, and other agents are covered by the scope of the policy and its guidelines.

POLICY

It is the responsibility of all those named in the Scope above to comply with this whistleblower policy by reporting violations or suspected violations in accordance with this policy.

The objectives of the Community Foundation's whistleblower policy are to establish policies and procedures to:

- Prevent or detect and correct improper activities
- Encourage each office, employee and volunteer (reporting individual) to report what he/she in good faith believes to be a material violation of law or policy or questionable accounting or auditing matter by the Community Foundation
- Ensure the receipt, documentation, retention of records and resolution of reports received under this policy
- Protect reporting individuals from retaliatory action

Reporting individuals must also notify the Community Foundation if an action needs to be taken in order for the Community Foundation to be in compliance with law, policy or with generally accepted accounting practices. The types of concerns that should be reported include, for purposes of illustration and without being limited to, the following:

- Providing false or misleading information in the Community Foundation's financial documents, grant reports, tax returns or other public documents

- Providing false information to or withholding material information from the Community Foundation's auditors, accountants, lawyers, directors, or other representatives responsible for ensuring the Community Foundation's compliance with fiscal and legal responsibilities
- Embezzlement, private benefit, or misappropriation of funds
- Material violation of Community Foundation policy including, among others, confidentiality, conflict of interest, whistleblower, ethics and document retention
- Discrimination based on race, gender, sexual orientation, ethnicity, disability or others protected by law
- Facilitation or concealing any of the above or similar actions

REPORTING CONCERNS

Anyone filing a complaint concerning a violation or suspected violation of the policy must be acting in good faith and have reasonable grounds for believing the information disclosed indicates a violation of the policy.

Violations or suspected violations may be submitted on a confidential basis by the complainant or may be submitted anonymously. Reports of violations or suspected violations will be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation.

Whenever practical, reports should be in writing.

Employees, Contingent Staff, and Consultants

Whenever possible, individuals should seek to resolve concerns by reporting issues directly to his/her manager or to the next level of management, as needed, until matters are satisfactorily resolved.

If, for any reason, an individual is not comfortable speaking to a manager or does not believe the issue is being properly addressed, the individual may contact the President & CEO.

If an individual does not believe that these channels of communication can or should be used to express his/her concerns, the individual may contact the chair of the Community Foundation's Audit Committee.

Directors, Volunteers, Vendors and Agents

Directors, other volunteers, vendors and other agents may submit concerns to the President & CEO or directly to the chair of the Audit Committee.

If the director, other volunteer, vendor or other agent is not comfortably reporting to either of these individuals, or if he/she does not believe the issue is being properly addressed, the report should be escalated directly to the board chair.

HANDLING OF REPORTED VIOLATIONS

The Community Foundation will investigate all reports filed in accordance with this policy with due care and promptness. Matters reported internally without initial resolution will be investigated by the President & CEO of the Community Foundation to determine if the allegations are true, whether the issue is material, and what actions, if any, are necessary to correct the problem. The Community Foundation staff will issue a full report of all matters raised under this policy to the Audit Committee.

For matters reported directly to the Audit Committee chair or the President & CEO, the committee will promptly (generally within five business days) acknowledge receipt of the complaint to the complainant if the complainant is known.

An investigation will be held to determine if the allegations are true, whether the issue is material, and what, if any, corrective action is necessary. Upon the conclusion of this investigation, the Audit Committee will promptly report its findings to the executive committee of the board.

Authority of the Audit Committee

The Audit Committee will have full authority to investigate concerns raised in accordance with this policy and may retain outside legal counsel, accountants, private investigators, or any other resource that the committee reasonably believes is necessary to conduct a full and complete investigation of the allegations.

NO RETALIATION

No officers, directors, employees (including temporary employees), consultants, volunteers, vendors, or agents who in good faith report a violation of the policy will suffer harassment, relation, or adverse consequences.

No punishment – including firing, demotion, suspension, harassment, failure to be considered for promotion, or any other kind of discrimination – will be permitted. Even if the claims are unfounded, the Community Foundation will not reprimand the employee.

An individual who retaliates against an individual who has reported a violation in good faith is subject to discipline up to and including termination of employment.

This policy is intended to encourage and enable employees and other individuals to raise serious concerns within the Community Foundation prior to seeking resolution outside the organization.

I have read the Whistleblower Policy, and agree to abide to it.

Printed Name

Signature

Date

I am a: ___ Board Member ___ Community Representative ___ Staff Member