

Community Foundation Partnership, Inc.
Governance Process Policies

4.12 Whistleblower Policy

Adopted 11-15-10

Revised 1-13-17

Open, truthful, and honest communications and operations are always in the best interest of the community and the Community Foundation Partnership Inc. In accordance with the Sarbanes-Oxley Act, which makes it a crime to punish anyone who reports improper activities, this policy provides a mechanism for volunteers, employees, and outside parties (such as vendors agents, and consultants) to anonymously report concerns regarding questionable or dishonest behavior, fraud, internal control, or accounting matters.

The Community Foundation Partnership Inc.'s (the "Partnership") internal controls and operating procedures are intended to detect and prevent or deter improper activities. However, even the best systems of control cannot provide absolute safeguards against irregularities. Intentional and unintentional violations of laws, regulations, policies and procedures may occur. The Foundation has a responsibility to investigate and report to appropriate parties, allegations of suspected improper activities and the actions taken by the Foundation.

A "whistleblower" is a person or entity making any good faith communication that discloses, or demonstrates an intention to disclose, information that may provide evidence of an improper activity or condition. The whistleblower's role is as a reporting party not an investigator or finder of fact, nor do they determine the appropriate corrective or remedial action that may be warranted.

Allegations of suspected improper activities are to be made in writing to assure a clear understanding of the issues raised. Such reports should be factual rather than speculative, and contain as much specific information as possible to allow for proper assessment of the nature, extent and urgency of preliminary investigative procedures.

Retaliation against the whistleblower, who in good faith reported the violation or activity, including but not limited to firing, demotion, suspension, harassment, failure to consider the employee for promotion, or any other kind of discrimination, is strictly prohibited.

Reports of allegations of suspected improper activities should be submitted to the CFP CEO. The CEO will inform the Treasurer and President of Board of the report. However, if the CEO is suspected of any wrongdoing, the report may be submitted to the Treasurer or President of the Partnership Board of Directors. If the Treasurer and/or President are suspected of wrongdoing the Vice President and/or Secretary will be informed of the wrongdoing.

Protection of a whistleblower's identity will be maintained to the extent possible within the legitimate needs of the investigation and the law. Should the whistleblower self-disclose his or her identity, the Partnership will no longer be obligated to maintain such confidence.

Anonymous whistleblowers must provide sufficient corroborating evidence to justify the commencement of an investigation. An investigation of unspecified wrongdoing or broad allegations will not be undertaken without verifiable evidentiary support. Because investigators are unable to interview anonymous whistleblowers, it may be more difficult to evaluate the credibility of the allegations and therefore, less likely to cause an investigation to be initiated.