

The Open Door Shelter WHISTLEBLOWER POLICY

Updated and Approved 07-19-2016

ODS is committed to observing high standards of legal and ethical business conduct. ODS expects its employees to exercise honesty and integrity in fulfilling the Organization's responsibilities and complying with all applicable laws and regulations. This policy is intended to encourage and enable good faith reporting of Wrongful Conduct (as defined below) and to protect individuals from retaliation who make such reports.

This policy creates a mechanism for an employee to report Wrongful Conduct. Wrongful Conduct is defined as a violation of applicable law or regulations or material violations of ODS's operating policies ("Wrongful Conduct").

Examples of Wrongful Conduct that this policy is intended to address include, but are not limited to:

- Falsification of the Organization's financial reports, tax returns or other financial documents;
- Non-compliance with the Organization's legal responsibilities;
- Misappropriation of funds or theft of property of the Organization; or
- Material violations of Organization policies contained in this Handbook.

No employee who in good faith reports Wrongful Conduct will suffer retaliation, harassment or adverse employment consequences. A good faith report would be described as "a reasonable person would reach the conclusion that suspicious malicious or illegal activity is occurring." All good faith reports should contain, at a minimum, a clear allegation containing as much specific information as possible such as dates, locations, and any other pertinent information, written or verbal.

Violations or suspected violations may be submitted on a confidential basis by the employee 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 and take any appropriate remedial action.

An employee may report Wrongful Conduct directly to the Executive Director or Board member. If the employee believes that the concerns reported will not be fairly considered, the report of Wrongful Conduct can be made to the Board President. The officer who receives the report must advise the Board President of the allegations of Wrongful Conduct immediately.

A person or committee so designated by the Board is responsible for supervising and directing a prompt investigation. The action taken will depend on the nature of the concern. A report of the conclusions of the review of the conduct will be made to the entire Board of Directors, who will then determine what disciplinary and corrective action, if any, shall be taken.

A person within the Organization who retaliates against an employee for filing a complaint is subject to disciplinary action up to, and including, termination of employment. Any reporting

person who believes he or she has been retaliated against should report it to the Executive Director or Board President immediately.

Reports of Wrongful Conduct which, after review, are determined to have been made maliciously or with the knowledge that the allegations were false may lead to disciplinary action up to and including termination.

Violations of this policy will be subject to such disciplinary and corrective action as the Board of Directors deems appropriate.

The Board of Directors shall review this policy periodically to ensure that it continues to satisfy the obligations of the Organization. Any changes to the policy will be communicated timely to all employees.