

CALLAWAY COUNTY UNITED WAY

Whistleblower Policy

The Callaway County United Way (CCUW) requires its employees, Board Members, agency employees, and volunteers to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. All individuals affiliated with the CCUW must practice honesty and integrity in fulfilling their responsibilities, complying with all applicable laws and regulations, and complying with the internal policies of the CCUW.

Who Should Report

This Whistleblower Policy is intended to encourage and enable any CCUW employee, Board Member, agency employee, or volunteer to submit a good faith complaint regarding suspected violations of the policies, laws, or practices set forth below, to the appropriate person, without fear of dismissal or other retaliation of any kind. A complainant may be anonymous, and, unless otherwise necessary for completion of an investigation, all complaints, including the identity of the complainant, if known, will be kept confidential.

What Should Be Reported

Suspected violations of the CCUW's code of ethics or other internal policies ("Policy Complaints"); accounting, internal auditing controls, or other auditing or financial matters ("Accounting Complaints"); or suspected violations of any law or regulation governing the CCUW's operations ("Legal Complaints"). Examples of the types of violations that should be reported are:

- Falsification of information on an agency application
- Improper handling of CCWU funds
- Breach of the CCUW confidentiality agreement
- Failure to disclose a conflict of interest

All complaints should describe the matter at issue in as much detail as possible to enable a full and complete investigation into the matter.

To Whom Should A Report Be Made

A complaint regarding a Policy or Legal Complaint should be submitted, in writing, to the President of the Board of Directors, or, in cases where the President is the subject of the complaint, to the Vice President or Executive Director. An Accounting Complaint should be submitted, in writing, to the Treasurer or President of the Board of Directors. Contact information for the Executive Director, President, Vice President, and Treasurer may be obtained by calling the Executive Director of the CCUW or visiting the CCUW's website at www.callawayunitedway.com.

Policy or Legal Complaints involving the President and received by the Executive Director shall be promptly forwarded to the Vice President. Accounting Complaints received by the President will promptly be forwarded to the Treasurer, who will record the receipt of all Accounting Complaints. Regarding a Policy or Legal Complaint, if the

President is the subject of the complaint, then the Vice President may be substituted for the President in the stated procedures of this policy. Regarding an Accounting Complaint, if the Treasurer is the subject of the complaint, then the President may be substituted for the Treasurer in the stated procedures of this policy.

Procedure Overview

Once the President receives a complaint, he or she must review and evaluate the complaint and make an initial determination as to whether it should be investigated, and if so, may designate an appropriate Callaway County United Way employee(s) and/or volunteer(s) to conduct such investigation. The Treasurer has discretion to request, and the President or Vice President has the authority to direct, special handling or investigation of any complaint, including the retention of outside counsel or advisors. The Treasurer shall also report on Accounting Complaints to the Audit Committee. The President, Vice President, Treasurer, or their designee, may contact persons submitting complaints, if known, and to the extent appropriate, to inform such persons of the results of any investigation and what, if any, corrective action has been recommended or taken.

Records concerning complaints will be retained by the CCUW for not less than seven (7) years after the complaint has been received.

When asked, CCUW employees, Board Members, agency employees, or volunteers shall fully and completely cooperate with such investigations. Failure to cooperate, or interfering with an investigation, shall subject employee(s), Board Members, or agency employees or volunteers to immediate disciplinary action, up to and including termination from employment with the CCUW, dismissal from the Board, or termination of agency funding.

No Retaliation

It shall be a violation of this Policy, and grounds for disciplinary action up to and including termination of employment, dismissal from the Board, or termination of agency funding, for any CCUW employee, Board Member, agency employee, or volunteer to discharge, demote, suspend, threaten, harass, or in any other manner retaliate against a person because of of his or her submission, in good faith, of any complaint referenced in this policy. However, if CCUW determines that the complaint was not made in good faith or that the complainant provided false information to the investigator, said person(s) may be subject to discipline, up to and including termination from employment with the CCUW, dismissal from the Board, or termination of agency funding.

This policy is not intended to, and does not create any rights, or any private right of action in any person.

This Policy is effective and approved by the Callaway County United Way Board as of the 18th day of September, 2014.