



Whistleblower Policy

Approved by the Board of Directors: February 15, 2022 (revisions)

Supersedes: September 23, 2015 (revisions, reformatted); September 23, 2015 (revisions, reformatted)

Introduction

West Creek Conservancy expects its employees, directors, interns, and volunteers to observe high standards of business and personal ethics and act with honesty and integrity when conducting their duties and responsibilities on behalf of the organization.

Each employee and director of West Creek Conservancy will sign a statement each year indicating that they have read and agree to abide by this Whistleblower Policy. This policy also provides guidance to interns and volunteers.

Reporting Responsibility

It is the responsibility of employees, directors, interns, and volunteers to report possible violations of West Creek Conservancy's Code of Conduct or any laws or regulations that govern West Creek's operations. This Whistleblower Policy enables these individuals to raise concerns without fear of reprisal. This policy also requires individuals to raise any concerns promptly so that West Creek can address and resolve the matter.

The following require reporting:

- Known or suspected violation of any applicable federal, state, or local law or regulations (e.g. discrimination, fraud, harassment).
- Known or suspected violation of West Creek's Code of Conduct or other policy or regulation governing the organization.
- Any questionable practice or improper matter regarding bookkeeping, accounting, internal accounting controls, or auditing.
- Inappropriate handling or resolution of a complaint or concern previously reported under this policy.

Reporting Procedure

West Creek Conservancy urges employees and interns to discuss concerns or complaints with their supervisor. If they are not comfortable conferring with their supervisor or are not satisfied with their supervisor's response, they are encouraged to speak with any member of the board's Governance Committee. Directors with concerns or complaints are urged to speak directly with the Executive Director or Board Chair.

To initiate an investigation, employees, directors, interns, and volunteers with concerns or complaints are required to submit them on the Whistleblower Reporting Form directly to

any member of the board's Governance Committee, who will have responsibility for coordinating an investigation into the reported concerns or complaints. If the matter involves any member of the board's Governance Committee, then the complainant should submit the form to the Board Chair, who will bring it before the board to assign the responsibility of investigation. If the matter involves any member of the board's Governance Committee and the Board Chair, then the complainant should submit the form to another officer of the board, who will bring it before the board to assign the responsibility of investigation.

Complainants must act in good faith and have reasonable grounds for believing that the information provided indicates a possible violation. Any allegations that prove to have been made maliciously or knowingly to be false will be viewed as a serious offense.

Reports may be submitted on a confidential basis by the complainant. Reports of possible violations will be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation and resolve the concern.

Handling of Reported Violations

Within fourteen (14) calendar days of submission, the member of the Governance Committee to whom the Whistleblower Reporting Form has been submitted, Board Chair, or other assigned investigator will provide written acknowledgment to the complainant of the report of a possible violation. All reports will be promptly investigated and appropriate corrective action will be initiated if warranted. As appropriate, the member of the Governance Committee, Board Chair, or other assigned investigator may confer with the Executive Committee or board.

No Retaliation

No employee, director, intern, or volunteer of West Creek Conservancy may retaliate against someone who in good faith:

- Reports any possible violation under this policy.
- Participates in an investigation by a regulatory authority, law enforcement agency, or a person with supervisory or leadership authority in West Creek.
- Provides truthful information relating to any state or federal offense to a law enforcement officer.

Retaliation includes discharge, demotion, suspension, threat, harassment, or any manner of discrimination against an individual.

Response to Retaliation

Any employee, director, intern, or volunteer who has reason to believe that he or she has been subjected to retaliation for making a report or participating in an investigation under this policy must promptly report such alleged retaliation. Anyone found to have committed retaliation will be subject to disciplinary action. In the case of retaliation by an employee, this action can include termination of employment. In the case of retaliation by a director, disciplinary action can include removal from the board.

WHISTLEBLOWER REPORTING FORM

The purpose of this form is to encourage reporting of any action or suspected action taken within West Creek Conservancy that is illegal, fraudulent, unethical, or in violation of any adopted policy of West Creek. Anyone reporting a possible violation must act in good faith, without malice to West Creek or any individual, and have reasonable grounds for believing that a violation occurred.

Any report that the complainant made maliciously or any report that the complainant has good reason to believe is false will be viewed as a serious disciplinary offense.

NO ONE WHO IN GOOD FAITH MAKES A REPORT OR COOPERATES IN THE INVESTIGATION OF A VIOLATION SHALL SUFFER HARASSMENT, RETALIATION, OR ADVERSE EMPLOYMENT CONSEQUENCES.

REPORT

[Please include as much detail as possible to enable a thorough investigation. Please go beyond the question prompts and the lines provided if necessary to adequately describe the matter.]

What act occurred and how do you believe it was fraudulent, illegal, or inappropriate? Describe the nature of any injury or damage sustained.

When and where did the possible violation occur? Who do you believe committed it? Indicate if actions took place over a period of time.

What do you believe enabled the action(s) to occur (e.g.: a lack of controls, circumvention of controls, or collusion with other individuals)? Are you aware of any motives for misconduct or circumstances that caused or allowed it to happen?

Does the possible violation involve the participation of people external to West Creek Conservancy? Who? When?

Is there other relevant information?

Who, if anyone, can verify the information provided in this report?

EVIDENCE: Please attach a copy or original of any supporting documents or other evidence in your possession, if any. Do not attempt to obtain more evidence; you are a reporting party and not an investigator of the possible violation.

Name of Person Filing Report

[Making a complaint does not automatically shield you from consequences of your own involvement in unlawful or improper conduct.]

Signature

Date

Print Name