



Whistleblower Policy

The Owen County Community Foundation is committed to lawful and ethical behavior in all of its activities and requires directors, volunteers, consultants, and employees to act in accordance with all applicable laws, regulations and policies and to observe high standards of business and personal ethics in the conduct of their duties and responsibilities.

Whistleblower Policy and Procedures

The objectives of the Foundation's Whistleblower Policy are to establish policies and procedures to prevent or detect and correct improper activities, encourage each Foundation director, officer, employee, and volunteer to report what he or she in good faith believes to be a material violation of law or policy or questionable accounting or auditing matter by the Foundation, ensure the receipt, documentation, retention of records, and resolution of reports received under this policy, and protect Reporting Individuals from retaliatory action.

Reporting Responsibility

Each Reporting Individual has an obligation to report what he or she believes is a material violation of law or policy or any questionable accounting or auditing matter by the Foundation, its officers, directors, employees, volunteers, agents or other representatives. Reporters must also notify the Foundation if an action needs to be taken in order for the Foundation to be in compliance with law or 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 on the Foundation's financial documents, grant reports, tax returns or other public documents;
- providing false information to or withholding material information from the Foundation's auditors, accountants, lawyers, directors or other representatives responsible for ensuring Foundation compliance with fiscal and legal responsibilities;
- embezzlement, private benefit, or misappropriation of funds;
- material violation of Foundation policy, including among others, confidentiality, conflict of interest, whistleblower, ethics and document retention;
- facilitation or concealing any of the above or similar actions

Reporting

Employees

Whenever possible, employees 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. However, if for any reason an employee is not comfortable speaking to a manager or does not believe the issue is being properly addressed, the employee may contact the Foundation's CEO or Board Chair. Whenever practical, reports should be in writing.

Managers/Supervisors

Managers are required to report suspected fraudulent or dishonest conduct to the CEO or Board Chair. While managers are expected to exercise reasonable care to avoid baseless allegations, they should not conduct their own investigations. Managers should avoid discussing the suspected conduct with anyone other than the CEO or Board Chair.

Directors, Consultants, and Other Volunteers

“Directors” refers to members of the Board of Directors. Directors, contracted consultants, and other volunteers may submit concerns to the CEO or the Board Chair. Whenever practical, reports should be in writing.

Reports may be submitted anonymously. Because it is impossible to seek additional information from a reporting individual about anonymous reports, such reports should include as much specific information as possible.

Handling of Reported Violations

The Foundation will investigate all reports filed in accordance with this policy with due care and promptness. The scope and other details of every investigation will depend on the nature of the report and the related circumstances. Matters reported to the CEO may be investigated by the CEO. However, the CEO shall promptly report the initiation of an investigation to the Board Chair. Matters reported to the Board Chair may be referred to the CEO for investigation or to the Executive Committee. To protect the privacy of the individuals involved, the Foundation will handle the matter with as much discretion as the circumstances permit. Appropriate corrective action will be taken if called for based upon the facts determined by the investigation.

Whistleblower Protection

No director, volunteer, or employee who makes a report in good faith under this policy shall be threatened, discriminated against or otherwise subject to retaliation. A volunteer or employee who retaliates against someone who has reported a concern in good faith is subject to discipline up to and including dismissal from the volunteer position or termination of employment. The Foundation will treat retaliation as a separate and independent violation of this policy. Whistleblowers who believe that they have been retaliated against may file a written complaint with the CEO or Board Chair.

***Adopted by Board of Directors on September 23, 2008
Amended by Board of Directors on April 18, 2023***