

WHISTLEBLOWER POLICY



Purpose and Responsibility

United Way of Washington County, Maryland (UWWC) requires directors, officers and employees to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. As representatives of United Way of Washington County, the practice must be one of honesty and integrity in fulfilling responsibilities and remaining in compliance with all applicable laws and regulations.

Reporting Responsibility

It is the responsibility of all representatives to comply with this Whistleblower Policy and to report violations or suspected violations as outlined. 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 UWWC's financial documents, grant reports, tax returns or other public documents;
- Providing false information to or withholding material information from UWWC's auditors, accountants, lawyers, trustees or other representatives responsible for ensuring UWWC compliance with fiscal and legal responsibilities;
- Embezzlement, private benefit, or misappropriation of funds;
- Material violation of UWWC policy, including among others, confidentiality, conflict of interest, whistleblower, ethics and documentation retention;
- Discrimination based on race, color, religion, sex, national origin, age, disability, height, weight, economic status, or status as Vietnam-era or special disabled veteran;
- Violation of Federal, Maryland or local laws, rules or regulations;
- Facilitation or concealing any of the above or similar actions

Reporting Concerns

Reporting individuals (employees, trustees, volunteers, donors, concerned citizen, etc.) may submit concerns to the Executive Director or directly to the Treasurer. Whenever practical, the reports should be in writing. If the reporting Individual is not comfortable reporting to either of these individuals or if she/she does not believe the issue is being properly addressed, the volunteer or trustee may report directly to the Board Chair. Contact information for the Board Chair may be obtained by calling UWWC at 301-739-8200 or found on UWWC website-www.unitedwaywashcounty.org under the About Us tab.

Concerns may be submitted anonymously. Because it is impossible to seek additional information from a reporting individual about anonymous reports, it is essential that such reports contain as much specific information as possible.

Handling of Reported Violations

UWWC will investigate all reports filed in accordance with this policy with due care and promptness. Matters reported internally without initial resolution will be investigated by the Executive Director to determine if the allegations are true, whether the issue is material and what actions, if any are necessary to correct the problem. UWWC staff will issue a full report of all matters raised under this policy to the Finance Committee. The Finance

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Committee may conduct a further investigation upon receiving the report from the Executive Director.

For matters reported directly to the Treasurer or the Board Chair, The Finance Committee shall promptly (generally within five business days) acknowledge receipt of the complaint to the complainant if the identity of the complainant is known and conduct an investigation to determine if the allegations are true and whether the issue is material and what, if any, corrective action is necessary. Upon the conclusion of this investigation, the Finance Committee shall promptly report its findings to the Executive Committee.

No Retaliation

No representative who in good faith reports a violation of the Policy shall suffer harassment, retaliation or adverse employment consequence. A representative who retaliates against someone who has reported a violation in good faith is subject to discipline up to and including termination of employment or position on the Organization's board. This Whistleblower Policy is intended to encourage and enable employees and others to raise serious concerns within the Organization prior to seeking resolution outside the Organization.

Accounting and Auditing Matters

The Finance Committee shall address all reported concerns or complaints regarding accounting practices, internal controls or auditing. The Chairman of the Board and/or Treasurer shall immediately notify the Finance Committee of any such complaint and work with the committee until the matter is resolved.

Acting in Good Faith

Anyone filing a complaint concerning a violation or suspected violation of the Policy must be acting in good faith and have reasonable grounds for believing the information disclosed indicates a violation of the Policy. Any allegations that prove not to be substantiated and which prove to have been made maliciously or knowingly to be false will be viewed as a serious offense.

Confidentiality

Violations or suspected violations may be submitted on a confidential basis by the complainant 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.

Review of this policy will occur at least every five years.

Approved Finance Committee: May 17, 2017

Approved by the Board of Directors: May 25, 2017

Next review of policy: No later than May, 2022