

# **Whistleblower Policy**

## **1. Purpose**

The Carousel of Happiness (herein referred to as “the organization”) requires directors, other volunteers, and employees to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. Employees and representatives of the organization must practice honesty and integrity in fulfilling their responsibilities and comply with all applicable laws and regulations.

The objectives of this policy are to establish procedures for a) the submission of concerns regarding questionable actions, decisions, or other matters by employees, directors, officers, and other stakeholders of the organization, on a confidential and anonymous bases, b) the receipt, retention, and treatment of complaints received by the organization regarding such matters, c) the protection of directors, volunteers, and employees reporting concerns from retaliatory actions.

## **2. Reporting Responsibility**

Each director, volunteer, and employee of the organization has an obligation to report in accordance with this Whistleblower Policy (a) questionable or improper actions, decisions, or other matters by employees, directors, and/or officers, and (b) violations and suspected violations of the organization’s policies (herein collectively referred to as “concerns”). Appropriate subjects to report under this policy include but are not limited to financial improprieties, accounting or audit matters, ethical violations, or other similar illegal or improper practices, such as: fraud, theft, embezzlement, bribery or kickbacks, misuse of the organization’s assets, and undisclosed conflicts of interest.

## **3. Authority of Board of Directors & Committees**

All reported Concerns will be forwarded to the Board of Directors in accordance with the procedures set forth herein. The Board of Directors (or a Committee established in accordance with the organization’s bylaws) shall be responsible for investigating, and making appropriate recommendations with respect to all reported concerns. If a member of the Board of Directors is a subject of the concern, that individual shall not participate in any discussion or investigation of the concern related to them.

## **4. No Retaliation**

This Whistleblower Policy is intended to encourage and enable directors, volunteers, and employees to raise concerns within the organization for investigation and appropriate action. With this goal in mind, no director, volunteer, or employee who, in good faith, reports a concern shall be subject to retaliation or, in the case of an employee, adverse employment

consequences. Moreover, 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.

## **5. Reporting Concerns**

Any concerns should first be discussed with an immediate supervisor; for volunteers this is the individual that arranged the volunteer schedule, for directors this is the President, and for all other staff this is the Director.

If, after speaking with a supervisor, the individual continues to have reasonable grounds to believe the concern is valid, the individual should submit a written report of the concern to the Director (if the individual is uncomfortable speaking with the Director, or the Director is a subject of the concern, the individual should report their concern directly to the President).

The Director is required to promptly report the concern to the Board of Directors, who has specific and exclusive responsibility to investigate all concerns. If the Director, for any reason, does not promptly forward the concern to the Board of Directors, the reporting individual should directly report the concern to the President of the organization.

Concerns may also be submitted anonymously. Such anonymous concerns should be in writing and sent directly to the Director (or, in accordance with above, to the President).

## **6. Handling of Reported Violations**

The Board of Directors shall address all reported concerns. The Director (or President, if they received the concern) shall immediately notify the President and the Board of Directors of any such report. The Director (or President, if they received the concern) will notify the sender and acknowledge receipt of the concern within five business days, if possible. It will not be possible to acknowledge receipt of anonymously submitted concerns.

All reports will be promptly investigated by the Board of Directors, and appropriate corrective action will be recommended, if warranted by the investigation. In addition, action taken must include a conclusion and/or follow-up with the complainant for complete closure of the concern. The Board of Directors has the authority to retain outside legal counsel, accountants, private investigators, or any other resource deemed necessary to conduct a full and complete investigation of allegations.

## **7. Acting in Good Faith**

Anyone reporting a concern must act in good faith and have reasonable grounds for believing the information disclosed indicates an improper accounting or auditing practice, or a violation of the organization's policies and/or code of conduct. The act of making allegations that prove

to be unsubstantiated, and that prove to have been made maliciously, recklessly, or with the foreknowledge that the allegations are false, will be viewed as a serious disciplinary offense and may result in discipline, up to and including dismissal from the volunteer position or termination of employment. Such conduct may also give rise to other actions, including civil lawsuits.

#### **8. Confidentiality**

Reports of concerns, and investigations pertaining thereto, shall be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation. Disclosure of reports of concerns to individuals not involved in the investigation will be viewed as a serious disciplinary offense and may result in discipline, up to and including termination of employment. Such conduct may also give rise to other actions, including civil lawsuits.

#### **9. Adoption of Policy and Review**

This policy has been reviewed and adopted by The Board of The Carousel of Happiness at the regular meeting on February 16, 2022. The Board must approve any changes to this policy. The policy will be reviewed bi-annually by the Executive Committee.