

**Calumet Heritage Partnership
Whistleblower Policy**

Adopted by Board Resolution on January 10, 2019

Policy: This organization has adopted a Code of Conduct that requires directors, officers, and employees to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. It is the responsibility of all directors, officers, and employees to report violations or suspected violations of the Code in accordance with this Whistleblower Policy. No director, officer, or employee who in good faith reports a violation of the Code shall suffer harassment, retaliation, or adverse employment consequence.

Code of Conduct

The directors, officers, and employees of this organization are expected to adhere to high standards of ethical conduct. Although it is impossible to describe all conduct that is to be addressed, this policy specifically requires the following:

1. Honest and ethical conduct, including the ethical handling of actual or apparent conflicts of interest between personal and professional relationships.
2. Full, fair, accurate, and timely disclosure of relevant facts in all reports and documents dealing with matters of program services, governance, and business administration.
3. Compliance with all applicable governmental laws, rules, and regulations.
4. Prompt internal reporting of code violations to an appropriate person or persons within the organization.
5. Personal accountability for adherence to the Code.

Reporting Violations

Employees who suspect that the Code of Conduct has been violated shall report their concerns to someone who can address them properly. In most cases, an employee's Supervisor is in the best position to address an area of concern. Where the reporter is not comfortable speaking with a Supervisor or is not satisfied with a supervisor's response, he/she shall bring the matter to the President of the Board of Directors, or another member of the Board of Directors.

Acting in Good Faith

Anyone who files a complaint concerning a suspected violation of the Code of Conduct must have reasonable grounds for believing the information disclosed is true and correct. Unsubstantiated allegations that prove to have been made maliciously or without factual basis will be viewed as a serious disciplinary offense.

Confidentiality

Reports may be submitted on a confidential basis or anonymously. Reports of violations or suspected violations will be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation.

Handling of Reported Violations

The Supervisor or Board Member will notify the sender and acknowledge receipt of the reported violation or suspected violation within five business days. All reports will be promptly investigated and appropriate corrective action will be taken if warranted by the investigation.

No Retaliation

No director, officer, or employee who in good faith reports a violation of the Code shall suffer harassment, retaliation, or adverse employment consequence.