



Whistleblower Protection Policy

I. GENERAL POLICY. It is the policy of Impact Hope to require all directors, officers, employees, and volunteers to follow the highest ethical standards in the conduct of their duties and responsibilities. The officers, directors, employees' representatives, and volunteers of Impact Hope shall uphold high professional standards, comply with all applicable laws, and practice honesty and integrity in fulfilling our responsibilities and carrying out all of our work, our programs and our activities.

II. REPORTING RESPONSIBILITY. It is the responsibility of all directors, officers, employees, representatives and volunteers to report any violations or suspected violations they are aware of, of any local, state or federal laws or regulations, and to report any unethical behavior they become aware of, in accordance with the reporting procedures explained below. This Whistleblower Policy is intended to encourage and enable anyone in our organization to report violations of the law or raise concerns about unethical behavior within Impact Hope prior to seeking resolution outside of the organization.

III. NO RETALIATION. Impact Hope and its officers, directors, employees, representatives and volunteers all have a responsibility to make sure that anyone who reports a violation or suspected violation of any local, state or federal laws or regulations, or who reports unethical behavior, shall not suffer any retaliation. An employee who retaliates against someone who has reported a violation in good faith is subject to discipline up to and including termination of employment.

Retaliation includes any harmful action such as but not limited to harassment, interference with the lawful employment or livelihood, discharge or termination of employment, demotion, suspension, and any manner of discrimination with regard to promotions, compensation or other terms,

conditions or privileges of employment, or suffering any other adverse consequences as a result of submitting a whistleblower report. Retaliation also includes the removal of officers or directors, the suspension of members, or the banning of volunteers who file a whistleblower report.

IV. THE PROCEDURE FOR REPORTING VIOLATIONS. Whistleblower reports shall be submitted in writing to either the President or the executive director (if there is one), or if the report involves both of them then to other officers on the Board of Directors.

Other persons to whom a whistleblower may report are:

1. A reporting employee or volunteer's supervisor.
2. The program director or manager in charge of the area in which the violation has occurred or is suspected.
3. Officers of the Board of Directors.
4. The chair of another member of the Audit or Finance Committee if the matter relates to accounting or finance issues.
5. Any director.
6. An appropriate regulatory body such as the IRS or the Department of Justice.

V. HANDLING OF REPORTED VIOLATIONS. All whistleblower reports shall be promptly shared by whoever receives them, with another officer or top management official, so that two officials / people are made aware of every whistleblower report.

All whistleblower reports shall be promptly investigated, and appropriate corrective action shall be taken if warranted by the investigation. The following process will be used:

1. Whistleblower reports shall be promptly forwarded to the executive director, who will notify the Board president. If Impact Hope does not have an executive director or similar position, the Board president and another officer will conduct this process.
2. If it is not appropriate to contact the executive director or Board President because they are involved in the report or the alleged violation and is therefore not likely able to handle the investigation objectively, the remaining officers of the Board will be notified and will proceed with this process in place of the Board president and/or executive director.

3. The Board president or executive director will notify the reporter and acknowledge receipt of the whistleblower report within 10 business days if possible.
4. The Board president and executive director will determine the proper course of investigation. They may delegate the investigation to an appropriate person or committee including the audit or finance committee.
5. The president, the executive director, or the delegated person or committee shall strive to complete its investigation within 30 days of the initial report, and report the outcome of the investigation to the other officers or to the entire Board of Directors, and they shall decide what appropriate corrective action should be taken if it is warranted by the investigation. Additional time may be needed in some cases.
6. The Officers and Executive Director will inform the reporter of the results of the investigation and any corrective action that has been or will be taken.

VI. ACTING IN GOOD FAITH. Anyone filing a whistleblower complaint concerning a violation or suspected violation must be acting in good faith and have reasonable grounds for believing the information disclosed indicates a violation of local, state or federal law or regulation, or of unethical behavior. Any whistleblower who submits a report in good faith is fully protected by this policy, even if the report is, after investigation, not substantiated.

The act of making allegations that prove to be unsubstantiated and that prove to have been made maliciously, recklessly, or with the knowledge 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.

VII. CONFIDENTIALITY. Upon the request of the complainant, Impact Hope will use its best efforts to protect the confidentiality of the complainant for any good faith report. Reports of 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.