



CONNECTICUT RIVER WATERSHED COUNCIL

The River Connects Us

15 Bank Row, Greenfield, MA 01301

WHISTLEBLOWER POLICY

The Council's Code of Conduct (Code) 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 Whistleblower Policy are to establish policies and procedures for:

- The submission of concerns regarding questionable accounting or audit matters by employees, directors, officers, and other stakeholders of the organization, on a confidential and anonymous basis.
- The receipt, retention, and treatment of complaints received by the organization regarding accounting, internal controls, or auditing matters.
- The protection of directors, volunteers and employees reporting concerns from retaliatory actions.

Reporting Responsibility

Each director, volunteer, and employee of the Council has an obligation to report in accordance with this Whistleblower Policy (a) questionable or improper accounting or auditing matters, and (b) violations and suspected violations of this Code.

Authority of Finance Committee

All reported Concerns will be forwarded to the Finance Committee in accordance with the procedures herein. The Finance Committee shall be responsible for investigating, and making appropriate recommendations on all reported Concerns to the Board of Directors.

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.

Reporting Concerns

Concerns should be stated in writing when at all possible, and may be submitted anonymously. All reported Concerns shall be considered confidential and handled per this Policy.

Employees

Employees should first discuss their Concern with their immediate supervisor. If, after speaking with his or her supervisor, the individual continues to have reasonable grounds to believe the Concern is valid, the individual should report the Concern to the Executive Director or Board Chair. In addition, if the individual is uncomfortable speaking



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with his or her supervisor, or the supervisor is a subject of the Concern, the individual should report his or her Concern directly to the Board Chair.

The Executive Director or Board Chair is required to promptly report the Concern to the Chair of the Finance Committee, who has specific and exclusive responsibility to investigate all Concerns. If the Executive Director or Board Chair, for any reason, does not promptly forward the Concern, the reporting individual should directly report the Concern to the Chair of the Finance Committee.

Directors and Other Volunteers

Directors and other volunteers should submit Concerns directly to the Chair of the Finance Committee.

Handling of Reported Violations

The Finance Committee shall address all reported Concerns. The Chair of the Finance Committee shall immediately notify the Finance Committee, the Board Chair, the Executive Director, and President of any such report. The Chair of the Finance Committee will notify the sender and acknowledge receipt of the Concern within five business days, if possible.

All reports will be promptly investigated by the Finance Committee, and appropriate corrective action will be recommended to the Board of Directors, if warranted by the investigation. The Finance Committee shall review all review any applicable state or local laws or regulations, and the appropriate rules promulgated by other relevant regulatory bodies, if any. In addition, action taken must include a conclusion and/or follow-up with the complainant for complete closure of the Concern. The Finance Committee 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 the allegations.

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 practice or violation. 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.

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.