



## Triangle Community Foundation Whistleblower Policy

It is the policy of Triangle Community Foundation that its operations are conducted according to the highest standard of integrity, and that its officers, directors, employees, fellows, interns, volunteers, consultants, advisors, vendors and other agents observe the highest standard of business and personal ethics in the conduct of their duties and responsibilities. All employees and representatives of the Foundation are expected to practice honesty and integrity in fulfilling their responsibilities and to comply with all applicable laws and regulations.

### The Foundation's whistleblower policy is intended to

- Prevent or detect and correct improper activities.
- Encourage and enable employees and others to raise serious concerns about violations of law, regulation, accounting or auditing practices, ethics or organizational policy.
- Ensure the receipt, documentation, retention of records and resolution of reports.
- Protect reporting individuals from retaliatory action.

### Scope of Policy

All officers, directors, employees, fellows, interns, volunteers, consultants, advisors, vendors and other agents of the Foundation are covered by the scope of this policy and its guidelines.

### Reporting Responsibility

It is the responsibility of all those noted in the scope of policy to report violations or suspected violations in accordance with this policy.

## **No Retaliation**

The Foundation will not discharge, demote, suspend, threaten, harass or in any manner retaliate or discriminate against persons with respect to good faith reporting of violations or suspected violations. Further, the Foundation will not tolerate retaliation against an individual who has reported a suspected violation in good faith. Persons who retaliate against someone who has reported a violation in good faith will be subject to discipline, up to and including termination of employment, dismissal or removal.

## **Reporting Violations**

Whenever practicable, reports should be in writing. Employees, fellows and interns should seek to resolve concerns by reporting issues directly their supervisor, as needed, until matters are satisfactorily resolved. Supervisors are required to report suspected violations to the President, the CFO, or the Board Chair, as appropriate. If, for any reason, an employee, fellow or intern is not comfortable speaking with a supervisor, or is not satisfied with the supervisor's response, such individuals and others who are not employees, fellows or interns may report to the President, the CFO, or the Board Chair. Contact information for the President, CFO or the Board Chair may be obtained from the Foundation's website or by calling the Foundation at 919-474-8370.

## **Handling of Reported Violations or Suspected Violations**

The President, CFO, or Board Chair will notify the reporter and acknowledge receipt of the reported violation or suspected violation within five business days. The Foundation will investigate all reports with due care and promptness. Appropriate corrective action will be taken if warranted by the investigation.

## **Confidentiality**

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

## **Acting in Good Faith**

Anyone reporting a violation or suspected violation must be acting in good faith and have reasonable ground for believing the information disclosed indicates a violation of the ethics, policy, law or regulation. Any allegations that prove not to be substantiated and which prove to have been made maliciously or with reckless disregard for their truth or falsity will be viewed as a serious disciplinary offense.

## Guidelines and Procedures

Upon receipt of a report of violation or suspected violation, the President, CFO or Board Chair shall immediately acknowledge to the Reporter that the report has been received and will be promptly investigated in accordance with the following procedures:

- The President, the CFO, or the Board Chair will work in conjunction with the Governance Committee and its Chair to investigate all reported violations.
- As necessary, matters relating to concerns and complaints regarding accounting practices, internal controls and auditing will be addressed by the Audit Committee.
- The receipt, retention, investigation and treatment of the complaint shall be fully documented.
- All relevant matters, including suspected but unproved matters, will be reviewed and analyzed.
- Investigations may warrant investigation by an independent person such as auditors and/or attorneys.
- Appropriate corrective action will be taken, if necessary, consistent with the Foundation's Code of Conduct.
- Complaints will be handled with sensitivity, discretion and confidentiality to the extent allowed by the circumstances and the law.
- Findings will be communicated back to the reporter.
- Final resolution of the matter will be made by the Executive Committee in as efficient, timely and speedy manner as possible, not exceeding sixty (60) days.
- The President, the CFO, or the Board Chair will report, at least annually to the Board on reports and compliance activity.

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