

## **WASHINGTON AREA HUMANE SOCIETY WHISTLEBLOWER/CODE OF CONDUCT POLICY**

The Washington Area Humane Society (“Society”) is committed to maintaining the highest standards of conduct and ethical behavior and promoting a working environment that values respect, fairness and integrity. In keeping with the policy of maintaining the highest standards of conduct and ethics, the Society will investigate any suspected violation of applicable laws or fraudulent or dishonest use or misuse of the Society’s resources or property by members, Directors, employees or volunteers of the Society. All members, Directors, employees and volunteers shall act with honesty, integrity and openness in all their dealings for and with the Society. Failure to follow these standards will result in disciplinary action including possible termination of employment or membership, dismissal from the Board of Directors or termination of volunteer duties and possible civil or criminal prosecution if warranted. Members, Directors, employees and volunteers are encouraged to report suspected violation of laws or fraudulent or dishonest conduct (i.e., to act as “whistleblower”), pursuant to the procedures set forth below.

### **A. Definitions.**

1. Baseless Allegations: Allegations made with reckless disregard for their truth or falsity. Individuals making such allegations may be subject to disciplinary action by the Society, and/or legal claims by individuals accused of such conduct.
2. Fraudulent or Dishonest Conduct: A deliberate act, or failure to act, with the intention of obtaining an unauthorized benefit. Examples of such conduct include, but are not limited to:
  - forgery or alteration of documents;
  - unauthorized alteration or manipulation of computer files;
  - fraudulent financial reporting;
  - pursuit of a benefit or advantage in violation of the Society’s Conflict of Interest Policy;
  - misappropriation, conversion or misuse of the Society resources, such as funds, supplies, or other assets;
  - authorizing or receiving compensation for goods not received or services not performed;
  - authorizing or receiving compensation for hours not worked; and
  - other illegal activity or conduct in violation of applicable laws.
3. Whistleblower: An employee, member, Director or volunteer who informs a supervisor or any member of the Society’s Employee Relations Committee about an activity relating to the Society which that person reasonably and in good faith believes to be fraudulent or dishonest conduct.

### **B. Authority of Employee Relations Committee.**

All reported fraudulent or dishonest conduct will be forwarded to the Employee Relations Committee in accordance with the procedures set forth herein. The Employee Relations Committee shall be responsible for investigating, and making appropriate recommendations to the Board of Directors, with respect to all reported conduct.

**C. No Retaliation.**

This Policy is intended to encourage and enable persons to raise fraudulent or dishonest conduct within the Society for investigation and appropriate action without fear of retaliation. With this goal in mind, no member, Director, volunteer or employee who, in good faith, reports such conduct shall be subject to retaliation or, in the case of an employee, adverse employment consequences. Moreover, any person who retaliates against someone who has reported such conduct in good faith is subject to discipline up to and including dismissal as a member, dismissal from the Board or termination of employment or as a volunteer.

**D. Reporting Concerns.**

1. Employees. Employees should first discuss any concern regarding perceived fraudulent or dishonest conduct with their immediate supervisor. If the individual is uncomfortable speaking with his or her supervisor, or the supervisor is a subject of the concern, the employee should report his or her concern directly to a member of the Employee Relations Committee. If the concern is reported verbally, the person to whom the concern is being reported shall assist the reporting individual with reducing the concern to writing.

All supervisors are required to promptly report any such concern to a member of the Employee Relations Committee. If any supervisor, for any reason, does not promptly forward the concern to a member of the Employee Relations Committee, the reporting individual should directly report the concern to a member of the Employee Relations Committee. Contact information for the Employee Relations Committee shall be displayed in a prominent place at the offices of the Society and shall be provided to all employees along with a copy of this Policy.

2. Directors, Members and Volunteers. Directors, members and volunteers should submit any concerns regarding perceived fraudulent or dishonest conduct in writing directly to a member of the Employee Relations Committee.

**E. Handling of Reported Violations.**

The Employee Relations Committee shall address all reported concerns regarding perceived fraudulent or dishonest conduct. The Chair of the Employee Relations Committee shall immediately notify the remaining members of the Employee Relations Committee of any such report. The Chair of the Employee Relations Committee will notify the sender and acknowledge receipt of the concern within five business days, if possible.

All reports shall be promptly investigated by the Employee Relations Committee, and appropriate corrective action will be recommended to the Board of Directors 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 raised concern.

**F. Acting in Good Faith.**

Anyone reporting a concern regarding fraudulent or dishonest conduct must not raise baseless allegations, but instead, must act in good faith and have reasonable grounds for believing the information disclosed indicates fraudulent or dishonest 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 Board of Directors or the Society or termination of employment or as a volunteer. Such conduct may also give rise to other actions, including civil lawsuits.

**G. Confidentiality.**

Whistleblowing complaints will be handled with sensitivity, discretion and confidentiality to the extent allowed by the circumstances and the law. The Society will keep the whistleblower's identity confidential, unless (1) the person agrees to be identified; (2) identification is necessary to allow Society or law enforcement officials to investigate, respond effectively to, or prosecute the report; or (3) identification is required by law or court.

Disclosure of reports of concerns regarding fraudulent or dishonest conduct to individuals not involved in the investigation will be viewed as a serious disciplinary offense and may result in discipline, up to and including dismissal from the Board of Directors or the Society or termination of employment or as a volunteer. Such conduct may also give rise to other actions, including civil lawsuits.