



# COMMON THREADS

## **Whistleblower Policy**

### **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.

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### **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 speak with someone in the Human Resources Department, anyone in management, or the Compliance Officer directly. Supervisors and managers shall report suspected violations to the Compliance Officer (Board Secretary) directly via email at [whistle@commonthreads.org](mailto:whistle@commonthreads.org).

## **Compliance Officer**

The Compliance Officer is responsible for investigating and resolving all reported complaints and allegations concerning suspected violations of the Code of Conduct. The Compliance Officer shall advise the CEO and/or the audit committee when, in his/her discretion, the complaint entails a significant risk to the organization. The Compliance Officer shall report to the audit committee at least annually on compliance activity. In the event that a reported concern or complaint involves corporate accounting practices, internal controls or auditing, the Compliance Officer shall immediately notify the audit committee of the complaint and work with the committee until the matter is resolved.

## **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 Compliance Officer 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.

Name: \_\_\_\_\_ Date Received: \_\_\_\_\_