

# United Way of West Central Connecticut

## Whistleblower Policy

The United Way of West Central Connecticut (UWWCC) is committed to protecting employees, clients, donors, volunteers and applicants for employment from interference with making a disclosure of a violation or a suspected violation of any state or federal law, or regulation or UWWCC policy undertaken by a UWWCC employee, volunteer, Officer or Board of Directors member, in the performance of the individuals official duties, whether or not such action is within the scope of his or her relationship to or within the UWWCC. This includes but is not limited to, corruption, malfeasance, bribery, theft of UWWCC property, fraudulent claims, fraud, coercion, conversion, malicious prosecution, misuse of UWWCC property and facilities, or willful omission to perform duty.

If any employee, client, donor, volunteer or applicant for employment reasonably believes that such a violation has occurred, a written complaint must be filed by that person with the Chief Professional Officer or the Board Chair of UWWCC. If after a preliminary investigation it is determined that probable cause exists to substantiate the complaint, the Chief Professional Officer and/or the Board Chair shall form an ad hoc committee of five individuals to fully investigate the complaint (the "Committee").

In compliance with Sarbanes-Oxley Act of 2002 (codified at 18 U.S.C. - 1514A), UWWCC established these procedures to facilitate the making of disclosures. This provides protection from retribution to persons who seek to make disclosures of wrong doing against a staff member, Officer, Board member or volunteer. This policy does not replace the existing grievance process. It is to be followed only if a staff member, volunteer, donor or member of the public elects to make a disclosure of suspected or alleged corrupt or improper conduct and seeks protection under the Act.

Pursuant to this policy, individuals are forbidden from preventing or interfering with whistleblowers who make good faith disclosures of misconduct. Finally, UWWCC will exercise reasonable efforts to:

- investigate any complaints of retaliation or interference made by whistleblowers;
- take immediate steps to stop any alleged retaliation; and
- discipline any person associated with the UWWCC found to have retaliated against or interfered with a whistleblower.

It is the intent of UWWCC to adhere to all laws and regulations that apply to the organization and the underlying purpose of this policy is to support the organization's goal of legal compliance. The support of all employees, is necessary to achieving compliance with various laws and regulations. An employee is protected from retaliation only if the employee brings the alleged unlawful activity, policy, or practice to the attention of UWWCC and provides UWWCC with a reasonable opportunity to investigate and correct the alleged unlawful activity. The protection described below is only available to employees that comply with this requirement.

UWWCC will not retaliate against an employee who in good faith, has made a protest or raised a complaint against some practice of UWWCC, or of another individual or entity with whom UWWCC has a business relationship, on the basis of a reasonable belief that the practice is in violation of law, or a clear mandate of public policy.

UWWCC will not retaliate against employees who disclose or threaten to disclose to a supervisor or a public body, any activity, policy, or practice of UWWCC that the employee reasonably believes is in violation of a law, or a rule, or regulation mandated pursuant to law or is in violation of a clear mandate or public policy concerning the health, safety, welfare, or protection of the environment.

If it is determined that retaliation or interference has occurred, UWWCC, shall also determine what remedies are appropriate to satisfy the UWWCC's obligation to protect the whistleblower. The Board Chair, in consultation with the whistleblower and the Committee, shall take measures to protect or restore the whistleblower's position and reputation, including making any public or private statements, as appropriate. In addition, the Board Chair may provide protection against further retaliation by monitoring or disciplining the retaliator. If, however, the Committee determines that an adverse action would have been taken relative to the whistleblower, even in the absence of the whistleblower's allegations or participation in the investigation, then no corrective action will be taken to adjust that adverse action.

The UWWCC shall make this policy available to its Staff, volunteers and donors by posting it on its website.

Each employee of UWWCC shall receive a copy of this policy and by signing below indicates their receipt and understanding of this policy. The employee also verifies that he/she has been provided with an opportunity to ask questions about the policy.

Adopted June 21, 2006

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Signature

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Date