

# FRAUDLUENT OR DISHONEST CONDUCT & WHISTLEBLOWER POLICY STATEMENT

Rebuilding Together of South Lake County (RTSLC) will investigate any suspicious activities or behavior or suspected violation of law or RT Policy by management, staff, volunteers, or members of the organization. Anyone found to have violated any law or RTSLC Policy is subject to disciplinary action by Rebuilding Together, up to and including civil or criminal prosecution when warranted.

All members of the RTSLC community are encouraged to report any conduct that the individual believes to constitute a violation of law or RTSLC Policy (i.e., a whistleblower). Board members and volunteers are required to report suspected fraudulent or dishonest conduct to the President of the Board of Directors, if they feel this is more appropriate. For more information about definitions, rights and responsibilities, procedures, and contacts read the following.

### **Definitions:**

<u>Baseless Allegations</u>: allegations made with reckless disregard for their truth or falsity. People making such allegations may be subject to institutional disciplinary action and /or legal claims by individuals accused of such conduct.

**<u>RTSLC Policy</u>**: the policies set forth in corporation documents, board minutes or the staff handbook (when created).

<u>Whistleblower</u>: an employee who informs a manager, supervisor, the President and CEO, or the President of the Board of Directors about an activity which that person believes to be fraudulent or dishonest.

# Rights and Responsibilities:

# **Board Members and Volunteers**

Board members and volunteers are required to report suspected fraudulent or dishonest conduct to the President of the Board of Directors.

Reasonable care should be taken in dealing with suspected misconduct to avoid:

- Baseless allegations.
- Premature notice to persons suspected of misconduct and/or disclosure of suspected misconduct to others not involved with the investigation.
- Violations of a person's rights under law.

Accordingly, a Board member or volunteer with a suspected misconduct:

- Should not contact the person suspected to further investigate the matter or demand restitution.
- Should not discuss the case with anyone other than the President of the Board of Directors, the General Counsel, or a duly authorized law enforcement officer.
- Should direct all inquiries from any attorney retained by the suspected individual to the General Counsel.
- Should direct all inquiries from the media to the President.

# Whistleblower Protection

RTSLC will protect whistleblowers as provided below.

- RTSLC will use best efforts to protect whistleblowers against retaliation, as described below, although it cannot guarantee confidentiality. RTSLC will keep the whistleblower's identity confidential, unless (1) the person agrees to be identified; (2) identification is necessary to allow RT or law enforcement officials to investigate or respond effectively to the report; (3) identification is required by law; or (4) the person accused of Fraud Policy violations is entitled to the information as a matter of legal right in disciplinary proceedings.
- RTSLC Board members or volunteers may not retaliate against a whistleblower. Whistleblowers who believe that they have been retaliated against may file a written complaint with the President of the Board of Directors. A proven complaint of retaliation shall result in a proper remedy for the person harmed and the initiation of disciplinary action.
- Whistleblowers must be cautious to avoid baseless allegations and anonymous allegations are discouraged so that there can be appropriate follow-up questions and investigation which may not be possible unless the source of the information is identified.

Date	Signature