



## Whistleblowing Policy Procedures

### Purpose and Scope

The United Way of Saint Joseph County (UWSJC) is committed to operate in an ethical, honest and lawful manner in pursuit of fulfilling its mission and expects its employees, officers, directors, volunteers and agents to act in accordance with the highest ethical standards and applicable law. The United Way encourages all employees, officers, directors, volunteers and agents to report any activity by a employees, officers, directors, volunteers and agents, that violates any state or federal law or regulation or United Way policy. Pursuant to the Whistleblowing Policy these procedures are meant to provide an avenue to raise concerns and reassurance that in raising such concerns the individual will be protected from reprisals or victimization for whistleblowing in good faith. This Whistleblowing policy covers serious and sensitive concerns that could have a significant impact on United Way, such as actions that:

- ✚ May lead to incorrect financial reporting, or a violation of any financial, accounting or audit matters.
- ✚ Are unlawful, including but not limited to corruption, bribery, theft of United Way property, fraud, coercion, discrimination, misuse of United Way property or facilities, or
- ✚ Actions that are not in line with United Way policy or otherwise deemed to be serious improper conduct.

This policy covers all employees, officers, directors, volunteers or agents.

### Reporting misconduct

Any person who has complaints or concerns about United Ways' accounting, internal accounting controls, auditing matters, or unlawful actions, violations of Company Policy or serious improper conduct is encouraged to talk to his/her immediate supervisor, as applicable, or if that is not a valid option, voice his/her concerns to the designated UWSJC Ethics Officer on the United Way Board.

To raise complaints or concerns about or report a matter of questionable conduct as it relates to such actions as covered in the aforementioned "Purpose and Scope", you may complete and submit the appropriate form, contact the designated Ethics Officer of the United Way Board and describe the concerns and evidence of practices not consistent with current policy. Individuals who want to remain anonymous must provide written statements to the Ethics Officer outlining the issue and pertinent policy violation.

In order to facilitate a complete investigation a person should be prepared to provide as many details as possible, including a description of the questionable practice or behavior, the names of the persons involved, the names of possible witnesses, dates, times, places and any other available details

The United Way encourages all people with complaints or concerns to come forward with information and prohibits retaliation against employees raising such concerns. However, if a person feels more comfortable doing so, a written report may be made anonymously in the manner described above.

Supervisors who become aware of any questionable accounting or auditing matters or serious breach of conduct must immediately report them directly to the designated United Way Ethics Officer in accordance with the Whistleblowing policy and procedures. Supervisors who receive complaints of questionable accounting or auditing or improper conduct must consult with the Ethics Officer prior to undertaking an investigation or other action. The Ethics Officer or (the Chair of the United Way Board if the complaint is lodged against the Ethics Officer) has final responsibility and authority for the investigation and handling of any concerns or complaints.

Any supervisor who fails to report allegations of questionable accounting or audit practices or serious breach of conduct in accordance with this policy, or who fails to deal properly with such allegations may be subject to disciplinary action up to and including termination.

### **Investigation and Response**

The Ethics Officer will oversee the receipt and handling of allegations of questionable accounting, auditing or serious breaches of conduct including directing an appropriate investigation and response.

Based on the investigation, the Ethics Officer will direct United Way to take prompt and appropriate corrective action in response to the complaint or concern in order to ensure compliance with the legal and ethical standards of the United Way. If the Ethics Officer determines that a particular complaint or concern is not covered by the Whistleblowing Policy, they will refer the complaint or concern to the President of the United Way of Saint Joseph County for appropriate handling and response.

### **Confidentiality and Non-retaliation**

Reports of questionable accounting, auditing or serious breaches of conduct will be kept confidential to the extent possible consistent with the Ethics Officer's obligation to investigate and correct unlawful or unethical practices. In order to ensure confidentiality, an employee may elect to make a complaint anonymously.

United Way, or any of its employees or Board members, will not retaliate or take any form of reprisal against any person who makes a report pursuant to the Whistleblowing policy. Any such retaliation or reprisal by a United Way employee is forbidden. Any employee who retaliates against an employee, witness, or another person as described above will be subject to discipline, up to and including termination. People or employees who believe they are subject to retaliation because they have made a report or participated in an investigation should report such suspect retaliation to the Ethics Officer or to any member of the Governance and Personnel Committee of the United Way of Saint Joseph County in the same manner as described above for reporting of questionable practices. The right of a whistleblower for protection against retaliation does not include immunity for any personal wrongdoing.

Questions regarding this policy may be directed to the following:

2012 United Way of Saint Joseph County Ethics Officer: See current Board of Directors roster  
Robert K McQuade  
574-309-4558  
[rmcquad1@nd.edu](mailto:rmcquad1@nd.edu)  
1010 Estates Place, Mishawaka, Indiana, 46545

2012 Chair of the United Way of Saint Joseph County: Greg Downes

2012 Governance Committee Members: Robert McQuade, Chair  
James Frain  
Carl Kaser  
Mark Minne  
Randolph Rompola