



## Whistleblower Policy

CWRT Congress (the “Organization”) requires directors, officers, and volunteers to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. As representatives of the Organization, we must practice honesty and integrity in fulfilling our responsibilities and comply with all applicable laws and regulations.

### **Reporting Responsibility**

This Whistleblower Policy is intended to encourage and enable volunteers and others to raise serious concerns internally so that the Organization can address and correct inappropriate conduct and actions. It is the responsibility of all board members, officers, and volunteers to report concerns about violations of the Organization’s Code of Ethics policy or suspected violations of law or regulations that govern the Organization’s operations.

### **No Retaliation**

It is contrary to the values of the Organization for anyone to retaliate against any board member, officer, or volunteer who in good faith reports a violation of the Organization’s Code of Ethics Policy, or a suspected violation of law, such as a complaint of discrimination, or suspected fraud, or suspected violation of any law or regulation governing the operations of the Organization. An employee or volunteer who retaliates against someone who has reported a violation in good faith is subject to discipline up to and including termination.

### **Reporting Procedure**

Directors, officers, and volunteers should share their questions, concerns, suggestions, or complaints with someone who can address them properly. In most cases, volunteers should report to the President. However, if a volunteer is not comfortable speaking with the President or is not satisfied with the response, that volunteer is encouraged to report to any director of the organization.

### **Acting in Good Faith**

Any good faith report, concern or complaint is fully protected by this policy, even if the report, question, or concern is, after investigation, not substantiated. Anyone filing a complaint concerning a violation or suspected violation must be acting in good faith and have reasonable grounds for believing the information disclosed indicates a violation of the Organization’s Code of Ethics Policy or applicable law. Any allegation that proves not to be substantiated and have

been made maliciously or with knowledge that they were false will be treated as a serious disciplinary offense.

### **Confidentiality**

Upon the request of the complainant, the Organization will use its best efforts to protect the confidentiality of the complainant for any good faith report. Violations or suspected violations may be submitted on a confidential basis by the complainant. They may also be submitted anonymously by mailing the report to the President or a director. Reports of violations or suspected violations will be kept confidential to the extent possible, with the understanding that confidentiality may not be maintained where identification is required by law or to enable the Organization or law enforcement to conduct an adequate investigation.

### **Handling of Reported Violations**

All reports will be promptly investigated, and appropriate corrective action will be taken if warranted by the investigation. The complainant will be informed that follow-up has or is occurring within two weeks after the President or board member has received the complaint or report. The Executive Committee (President, Secretary and Treasurer) shall be informed of all such complaints or reports.

*Adopted 10/2/2020*