



## **WHISTLEBLOWER POLICY**

**OF**

## **RED STRING FOUNDATION**

### **ARTICLE 1 INTRODUCTION AND PURPOSE**

**Red String Foundation** (the “Foundation”) requires its directors, officers, employees and volunteers to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. The purpose of this policy is to encourage and enable employees and volunteers of the Foundation to report any action or suspected action taken within the Foundation that is illegal, fraudulent or in violation of any adopted policy of the Foundation, to a source within the Foundation before turning to outside parties for resolution. This policy applies to any matter which is related to the Foundation’s business including activities by external organizations and does not relate to private acts of an individual not connected to the business of the Foundation. This policy is intended to supplement but not replace the Foundation’s unlawful harassment and discrimination policy, “open door policy” and/or any other grievance procedure, and any applicable state and federal laws governing whistleblowing applicable to nonprofit and charitable organizations.

### **ARTICLE 2 VIOLATIONS; REPORTING IN GOOD FAITH**

All employees and volunteers of the Foundation are encouraged to report any action or suspected action taken within the Foundation that is illegal, fraudulent or in violation of any adopted policy of the Foundation. Anyone reporting a Violation must act in good faith, without malice to the Foundation or any individual in the Foundation, and have reasonable grounds for believing that the information shared in the report indicates that a Violation has occurred.

The following are examples of Violations that should be reported:

- (a) Stealing or misappropriation of the Foundation’s funds, supplies or other assets.
- (b) Fraud or deliberate error in the preparation, evaluation, review, or audit of any financial statement or accounting records of the Foundation.
- (c) Deviation from full and fair reporting of the Foundation’s financial condition.
- (d) Deficiencies in or non-compliance with the Foundation’s internal accounting controls.
- (e) Authorizing or receiving compensation for goods not received or services not performed.
- (f) Authorizing or receiving compensation for hours not worked, or failing to account for un-worked (but paid) hours as vacation, sick leave or other paid time off.
- (g) Pursuit of a benefit or advantage in violation of the Foundation’s conflict of interest policy.
- (h) Unauthorized alteration or manipulation of the Foundation’s documents or computer files in violation of the Foundation’s records management and retention policy.

The Foundation requires partner charities<sup>1</sup> to maintain an ethics and compliance program throughout the performance of the Foundation's grant project as provided in C9.0: Ethics and Compliance Program. Personnel from these partner charities can utilize the [Ethics@RedString](mailto:Ethics@RedString) website to report any suspected violations within their organizations to the Foundation. The Foundation Compliance Officer shall review any submitted complaints in accordance with the Complaint Review procedure, SOP-104.

### **ARTICLE 3 NO RETALIATION**

No employee or volunteer who in good faith reports a Violation or cooperates in the investigation of a Violation shall suffer harassment, retaliation or adverse employment or volunteer consequences. Any individual within the Foundation who retaliates against another individual who in good faith has reported a Violation or has cooperated in the investigation of a Violation is subject to discipline, including termination of employment or volunteer status.

If an individual believes that someone who has made a report of a Violation or who has cooperated in the investigation of a Violation is suffering from harassment, retaliation or other adverse employment or volunteer consequences, the individual should contact the Compliance Officer.

Any individual who reasonably believes he or she has been retaliated against in violation of this policy shall follow the same procedures as for filing a complaint (outlined in Article 4 below).

### **ARTICLE 4 REPORTING PROCESS**

If an individual reasonably believes that a Violation has occurred, the individual is encouraged to share his or her questions, concerns, suggestions or complaints with any person within the Foundation who may be able to address them properly.

In most cases, the direct supervisor of an individual is the person best suited to address a concern. However, if an individual is not comfortable speaking with his or her supervisor or if he or she is not satisfied with the supervisor's response, the individual is encouraged to speak directly to the Compliance Officer, or anyone in management he or she feels comfortable approaching.

### **ARTICLE 5 CONFIDENTIALITY**

The Foundation encourages anyone reporting a Violation to identify himself or herself when making a report in order to facilitate the investigation of the Violation. However, reports may be submitted on a confidential basis by the complainant or may be submitted anonymously by submitting a complaint at the [Ethics@RedString](mailto:Ethics@RedString) webpage located on the Red String website. Reports of Violations or suspected Violations will be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation, to comply with all applicable laws, and to cooperate with law enforcement authorities. Furthermore, the Foundation will explore anonymous allegations to the extent possible, but

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<sup>1</sup> Partner charities are defined as charities that: a) receive grants from the Foundation for a predetermined purpose that aligns with the Foundation's mission, or b) work with the Foundation as articulated by an agreement to achieve a particular goal in accordance with the Foundation's mission

will weigh the prudence of continuing such investigations against the likelihood of confirming the alleged facts or circumstances from attributable sources.

**Send Ethics Complaint forms to [admin@myredstring.org](mailto:admin@myredstring.org) with “Ethics Complaint” in the subject line.**

#### **ARTICLE 6 COMPLIANCE OFFICER; HANDLING REPORTED VIOLATIONS**

The supervisor, manager or board member who receives a report of a Violation from the complainant is required to notify the Compliance Officer of that report, except as provided below with respect to a report relating to the Compliance Officer. The Compliance Officer will notify the complainant and acknowledge receipt of a report of Violation within five business days, but only to the extent that the complainant’s identity is disclosed or a return address is provided.

- (1) The Compliance Officer, or his or her designee, is responsible for promptly investigating all reported Violations, apprising the Board of Directors, and for causing appropriate corrective action to be taken if warranted by the investigation. The complainant will be notified about what actions will be taken, to the extent reasonably possible and consistent with any privacy or confidentiality limitations. If no further action or investigation is to follow, an explanation for the decision will be given to the complainant. The Compliance Officer, or his or her designee, shall prepare a written record of the reported violation and its disposition, to be retained as specified in the Record Retention policy.

In the event the Compliance Officer is suspected of having committed a Violation, then the Violation will be reported to the Board Chair, and the Violation will be investigated by the Board Chair, under close supervision of the Board of Directors.

#### **ARTICLE 7 ACCOUNTING AND AUDITING MATTERS; REPORTS**

The CFO is responsible for addressing all reported concerns or complaints of Violations relating to corporate accounting practices, internal controls or auditing. Therefore, the Compliance Officer must immediately notify the CFO of any such concern or complaint.

In addition, the Compliance Officer will advise the Board of Directors of any other reported Violations, the current status of the investigation, and the outcome or corrective action taken at the conclusion of the investigation.

Adopted by the Board of Directors at its Meeting on

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