

## **WHISTLEBLOWER POLICY**

**Standard of Conduct** – United Way of South Texas (United Way) is entrusted with responsibilities, resources, and privileges to fulfill a unique role as a nonprofit organization serving its community. This trust requires that all members of the Board of Directors and all employees must demonstrate at all times exemplary moral, ethical, and legal behavior in the conduct of their organizational duties. Every action, statement, representation, policy, procedure, and practice of the organization as a whole and of its directors and employees individually and collectively must demonstrate integrity, honesty, and compliance with all applicable laws and regulations, and must be free of any self-dealing, personal aggrandizement, or un-acknowledged conflict of personal and organizational interests. This standard requires active loyalty to the welfare and reputation of the organization and loyalty to its vision, values, mission, policies, plans, and the community it serves.

To the extent reasonably possible, this Code of Ethics applies to volunteers serving under the identity or direction of United Way or with its approval.

**Responsibility to report** – This high standard of individual and organizational conduct is so important to the organization and the community that all directors and employees are responsible to report as soon as practicable and in an appropriate manner any suspected violation of any element of this standard of conduct by anyone in the organization or any of its representatives, organizational partners, or volunteers. Any failure to report such suspected violation is itself a failure to meet the standard of conduct, including failure to meet the duty of loyalty.

**Protection from retaliation** – Any director, other volunteer, or employee, who in good faith and in an appropriate manner reports a suspected violation of the standard of conduct, i.e. “blows the whistle” on inappropriate conduct, shall be protected from any form of retaliation, harassment, or adverse consequences affecting their employment or volunteer service. Any member of the organization who retaliates against someone who has reported properly and in good faith a concern about this standard of conduct will be subject to discipline, up to and including termination of their relationship with the organization.

**Purpose of whistleblower policy** – The purpose of this policy is to ensure the integrity, welfare, and reputation of the organization while protecting equally the integrity, welfare, and reputation of every innocent board member, employee, or other volunteer, and to enable the directors, other volunteers, and employees of the organization to safely raise such concerns within the organization prior to, and to the extent possible without, raising the issue outside the organization. Raising ethical or legal concerns in this way allows the matter to be investigated and appropriately remedied if it is verified.

*This approach serves and protects the good of all the persons involved and of the organization and the community it serves, and it also protects innocent persons from having their reputations injured by allegations that cannot be adequately corroborated.*

**Appropriate manner of reporting suspected violations** – The open door policy of United Way intends to provide appropriate ways to report suspected violations of this Code of Ethics so that the whistleblower and the suspected perpetrator of the wrong conduct are protected from any undeserved harassment or wrongful injury, but also so that appropriate action can be taken. For reporting by board members, the appropriate person to receive such a report is normally the President/CEO. For employees and volunteers the appropriate person to receive such a report is normally one's supervisor or the President/CEO or someone in another management position to whom the person is comfortable disclosing their concern.

**Acting in good faith** – Anyone that reports a suspected violation of this Code of Ethics must be acting in good faith and have some plausible basis for their suspicion. Any allegation that proves to be untrue will be dismissed without prejudice toward and party involved. Any person making an allegation that proves to have been made maliciously or knowingly on false grounds will be subject to discipline, up to and including termination of their relationship with the organization.

Unlike other workplace issues, which should first be resolved between the two parties themselves whenever possible, in cases of suspected violation of the Code of Ethics and of laws or regulations in particular, the report of suspected misconduct should not be made to the subject of the allegation. If the concern involves the President/CEO, the report should be made to the Board Chair, a member of the Executive committee of the Board, or another board officer.