

WHISTLEBLOWER POLICY

- 1) **PURPOSE:** The Siena/Francis House (SFH) requires directors, officers and employees to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. As employees and representatives of the SFH, we must practice honesty and integrity in fulfilling our responsibilities and comply with all applicable laws and regulations.
- 2) **POLICY:** This Whistleblower Policy is intended to encourage and enable employees and others to raise serious concerns internally so that SFH can address and correct inappropriate conduct and actions. It is the responsibility of all board members, officers, employees and volunteers to report concerns about violations of SFH's code of ethics or suspected violations of law or regulations that govern SFH's operations.

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

- 3) **RESPONSIBILITIES:**
 - a) The Executive Director has the responsibility to establish the Whistle Blower Policy and ensure implementation.
 - b) **Compliance Director:** The Compliance Director is responsible for receiving reports about alleged violations of agency policy, misappropriation of resources and fraud determining the most appropriate approach to investigating the claim.
 - c) **Directors and Managers:** Are responsible for maintaining an open door policy and ensuring operations of the SFH follow agency policy and ethical standards.
 - d) **Employees:** Employees have the responsibility to report any suspected ethical and policy violation, misappropriation of resources and fraud.

- 4) **PROCEDURES:**
 - a) SFH has an open door policy and suggests that employees share their questions, concerns, suggestions or complaints with their supervisor. If you are not comfortable speaking with your supervisor or you are not satisfied with your supervisor's response, you are encouraged to speak with the Compliance Director or the Executive Director. Supervisors and managers are

required to report complaints or concerns about suspected ethical and legal violations in writing to the SFH's Compliance Officer, who has the responsibility to investigate all reported complaints. Employees with concerns or complaints may also submit their concerns in writing directly to their supervisor or the Executive Director or the SFH's Compliance Officer.

- b) The SFH's Compliance Director is responsible for investigating and resolving all employee complaints and allegations concerning violations of the Whistleblower Policy. The Board Chair or his or her designee will take on the Compliance Director role if the complaint involves the Executive Director. If the complaint involves both the Executive Director and Board Chair, outside legal counsel will carry out the functions of the Compliance Director.
 - c) Accounting and Auditing Matters: The Finance Committee of the Board of Directors shall address all reported concerns or complaints regarding corporate accounting practices, internal controls or auditing. The Executive Director shall immediately notify the Finance Committee of any such complaint and work with the Committee until the matter is resolved.
 - d) Requirement of Good Faith: Anyone filing a complaint concerning a violation or suspected violation of the law or regulation requirements must be acting in good faith and have reasonable grounds for believing the information disclosed indicates a violation. Any allegations that prove not to be substantiated and which prove to have been made maliciously or knowingly to be false will be viewed as a serious disciplinary offense.
 - e) Confidentiality: Violations or suspected violations may be submitted on a confidential basis by the complainant. Reports of violations or suspected violations will be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation.
 - f) Handling of Reported Violations: The Compliance Director, or the person responsible for carrying out the Compliance Director's role with respect to a reported or suspected violation, will acknowledge receipt of the reported violation or suspected violation by writing a letter (or e-mail) to the complainant within five business days. All reports will be promptly investigated and appropriate corrective action will be taken if warranted by the investigation.
- 5) FOLLOW-UP RESPONSIBILITY: Executive Director (or designee) will review and update this policy every two years.
- 6) RECISSION: Policy dated 2010.