

## **Whistleblower Protection Policy**

Bread for Life requires board members, the executive director and employees to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. Representatives and employees of Bread for Life, must practice honesty and integrity in fulfilling their responsibilities and comply with all applicable laws and regulations.

#### **Reporting Responsibility**

This Whistleblower Policy is intended to encourage and enable employees and others to raise serious concerns internally so that Bread for Life can address and correct inappropriate conduct and actions. It is the responsibility of all board members, the executive director, employees and volunteers to report concerns about violations or suspected violations of law or regulations that govern Bread for Life's operations.

#### No Retaliation

It is contrary to the values of Bread for Life for anyone to retaliate against any board member, the executive director, 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 Bread for Life. 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.

# **Reporting Procedure**

Bread for Life has an open door policy and suggests that employees share their questions, concerns, suggestions or complaints with the executive director. If you are not comfortable speaking with the director or you are not satisfied with the director's response, you are encouraged to speak with the Compliance Officer directly. Supervisors and managers are required to report complaints or concerns about suspected ethical and legal violations in writing to the Bread for Life'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 the Executive Director or the Compliance Officer.

## **Compliance Officer**

Bread for Life's Compliance Officer is responsible for ensuring that all complaints about unethical or illegal conduct are investigated and resolved. The Compliance Officer will advise the Executive Director and the Board of Directors of all complaints and their resolution.

## **Accounting and Auditing Matters**

The Compliance Officer shall immediately notify the Finance Committee of any concerns or complaint regarding corporate accounting practices, internal controls or auditing and work with the committee until the matter is resolved.

# **Acting in Good Faith**

Anyone filing a written 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. 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.

#### **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.

#### **Handling of Reported Violations**

Bread for Life's Compliance Officer will notify the person who submitted a complaint and acknowledge receipt of the reported violation or suspected violation. All reports will be promptly investigated and appropriate corrective action will be taken if warranted by the investigation.

## **Compliance Officer**

The Compliance Officer will be a board member designated by the organization to receive, investigate and respond to complaints.

To contact Bread for Life's Compliance Officer, please call 860-302-1110

Policy reviewed and approved by the Board of Directors: January 12, 2021

Compliance Officer updated: November 12, 2021