

OPEN DOOR FOUNDATION WHISTLEBLOWER AND NON-RETALIATION POLICY

- I. GENERAL POLICY.** It is the policy of the Open Door Foundation to require all directors, officers, employees, and volunteers to conduct the affairs of the Open Door Foundation in a legal, ethical, and transparent manner. This Whistleblower Policy is intended to encourage and enable employees and others to report any unethical or illegal activities of which they become aware. This policy supersedes and replaces any prior whistleblower and non-retaliation policy.
- II. REPORTING RESPONSIBILITY AND CONFIDENTIALITY.** It is the responsibility of all directors, officers, employees, and volunteers to ensure the legal and ethical operation of the Open Door Foundation and to report violations or suspected violations of any local, state or federal laws or regulations or unethical behavior.

If a director, officer, employee, or volunteer discovers information that leads them to believe that illegal or unethical behavior has occurred, or is occurring, they shall report this discovery to the President of the Open Door Foundation. If the report involves the President, or the President is unavailable, the report shall be made to any other officer. If a whistleblower report is made to any person other than the President or an officer, that person shall bring it to the President or other officer.

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 local, state or federal law or regulation.

The act of making allegations that prove to be unsubstantiated and that prove to have been made maliciously, recklessly, or with the knowledge that the allegations are false, will be viewed as a serious disciplinary offense and may result in discipline, up to and including dismissal from the volunteer position or termination of employment. Such conduct may also give rise to other actions, including civil lawsuits.

Upon the request of the complainant, the Open Door Foundation 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 or may be submitted anonymously. Reports of violations or suspected violations will be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation and take appropriate corrective action.

- III. INVESTIGATION AND TIMELINE.** All reports will be promptly investigated and appropriate corrective action will be taken if warranted by the investigation. The following process will be used:

1. The officer receiving the report shall notify the reporter acknowledging receipt of the report within five (5) business days of receipt.
2. A meeting of the officers shall be called to determine the proper course of investigation.
3. Within thirty (30) days of receipt of the report the investigation will be completed and any appropriate corrective action will be commenced. Additional time may be needed in some cases.
4. The Open Door Foundation will notify the reporter of the results of the investigation and any corrective action that has been or will be taken.

IV. NO RETALIATION. If a director, officer, employee, or volunteer reports in good faith a violation, or suspected violation, of any local, state or federal laws or regulations they shall not suffer any discrimination, harassment, retaliation or adverse employment consequences. Any director, officer, employee, or volunteer who discriminates or retaliates against someone who has reported a violation in good faith is subject to discipline up to and including termination of employment or volunteer status.

Retaliation includes, but is not limited to, any harmful action, interference with the lawful employment or livelihood, discharge, demotion, suspension, any manner of discrimination with regard to promotion, compensation or other terms, conditions or privileges of employment.

Adopted by the Board of Directors of the Open Door Foundation on March 5, 2019.



Date: 3-5-2019

Michelle Meador, Secretary

Date last reviewed: _____