



Whistleblower Policy

I. General

The Ottumwa Regional Legacy Foundation's (ORLF's) Code of Ethics requires directors, officers, employees, and volunteers to observe high standards of business and personal ethics in the conduct of their duties and responsibilities.

As employees and representatives of ORLF, we must practice honesty and integrity in fulfilling our responsibilities and comply with all applicable laws and regulations.

II. Reporting Responsibility

It is the responsibility of all directors, officers, employees, and volunteers to comply with and to report violations or suspected violations of the Code of Ethics, ORLF policies, or laws in accordance with this policy. Failure to report known or suspected violations could result in discipline up to and including termination of employment or volunteer relationship.

III. No Retaliation

No director, officer, employee or volunteer who in good faith reports a violation of the Code, ORLF policies, or law shall suffer harassment, retaliation or adverse employment consequence. Retaliation against those who have reported a violation in good faith will not be tolerated by ORLF. An employee who engages in retaliation is subject to discipline up to and including termination of employment. Relationships with volunteers engaging in retaliation will be terminated immediately. This Whistleblower Policy is intended to encourage and enable employees and others to raise serious concerns within ORLF prior to seeking resolution outside ORLF.

IV. Reporting Violations

Directors, officers, employees, and volunteers should share their questions, concerns, suggestions or complaints with someone who can address them properly. In most cases, the whistleblower should report the suspected or actual event to his/her supervisor. If the supervisor is participating in the violation or there is a suspicion the supervisor is involved in the violation, then the whistleblower should report the event to the Foundation President. However, if an employee or volunteer is not comfortable speaking to the Foundation President or is not satisfied with the response, that employee or volunteer is encouraged to report to any officer of the board.

V. Acting in Good Faith

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 the Code, ORLF policy, or law. Any allegations that prove to be unsubstantiated and made maliciously or with knowledge that they were false will be treated as a serious disciplinary offense up to and including termination.

VI. Confidentiality

Upon the request of the complainant, ORLF 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.

VII. Handling of Reported Violations

All reports will be promptly investigated and appropriate corrective action will be taken if warranted by the investigation. The complainant will be informed that follow-up has or is occurring within two weeks after the President or board officer has received the complaint or report. The President shall be informed of all such complaints or reports.