

# *Friends of the San Pedro River*

## **Whistleblower Policy**

### **General**

The Friends of the San Pedro River, hereinafter the Society, maintains policies consistent with its mission. The Society's Code of Ethics and Conduct ("Code") 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 the Society, we must practice honesty and integrity in fulfilling our responsibilities and comply with all applicable laws and regulations

### **Reporting Responsibility**

It is the responsibility of all directors, officers, employees, and volunteers to comply with the Code and to report violations or suspected violations in accordance with the Whistleblower Policy.

### **No Retaliation**

No director, officer, employee, or volunteer who in good faith reports a violation of the Code shall suffer harassment, retaliation, or adverse employment consequence. 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. Volunteers are also covered under this policy. This Whistleblower Policy is intended to encourage and enable employees and others to raise serious concerns within the Society prior to seeking resolution outside the Society.

### **Reporting Violations**

The Code addresses the Society's open door policy and suggests that employees share their questions, concerns, suggestions, or complaints with someone who can address them properly. In most cases, the President is in the best position to address an area of concern. However, if you are not comfortable speaking the President or you are not satisfied with the President's response, you are encouraged to speak with any member of the Board of Directors whom you are comfortable in approaching. Officers and Directors are required to report suspected violations of the Code of Conduct to the President or board member or officer designated by the President to fulfill that responsibility, who has specific and exclusive responsibility to investigate all reported violations. For suspected fraud, or when you are not satisfied or uncomfortable with following this procedure, individuals should contact the President, designated officer, or any board member directly.

### **Compliance Officer**

The President, or officer or board member appointed by the President to fulfill that

For more information contact the Friends of the San Pedro River, visit [www.sanpedroriver.org](http://www.sanpedroriver.org) or send e-mail to [fspr@sanpedroriver.org](mailto:fspr@sanpedroriver.org)

responsibility, is responsible for investigating and resolving all reported complaints and allegations concerning violations of the Code and, at his discretion, shall advise the President and/or the Board of Directors. The Compliance Officer is required to report to the Board of Directors at least annually on compliance activity.

### **Acting in Good Faith**

Anyone filing a complaint concerning a violation or suspected violation of the Code must be acting in good faith and have reasonable grounds for believing the information disclosed indicates a violation of the Code. 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 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.

### **Handling of Reported Violations**

The Compliance Officer will notify the sender and acknowledge receipt of the reported violation or suspected violation within five business days. All reports will be promptly investigated and appropriate corrective action will be taken if warranted by the investigation.