

## ORLEANS CONSERVATION TRUST

### Whistleblower Policy

Adopted July 13, 2013 (Amended 1-22-19)

This policy is intended to encourage Orleans Conservation Trust (“OCT”) Board members, staff (paid and volunteer) and others to report suspected or actual occurrence(s) of illegal, unethical or inappropriate events (behaviors or practices) without retribution.

1. The Whistleblower should promptly report the suspected or actual event to the OCT President.
2. If the Whistleblower would be uncomfortable or otherwise reluctant to report to the President, then the Whistleblower could report the event to an appropriate Board member.
3. The Whistleblower can report the event with his/her identity known, or anonymously.
4. The Whistleblower shall receive no retaliation or retribution for a report that was provided in good faith – that was not done primarily with malice to damage another individual or the organization.
5. A Whistleblower who makes a report that is not done in good faith is subject to discipline, including termination of the Board or employee relationship, or other legal means to protect the reputation of the organization and members of its Board and staff.
6. Anyone who retaliates against the Whistleblower (who reported an event in good faith) will be subject to discipline, including termination of Board or employee status.
7. The President, or the Board member who receives the complaint, shall promptly appoint a committee of three Board members to investigate and/or resolve the issue.
8. The Whistleblower shall receive a report regarding the investigation, disposition or resolution of the issue.
9. If the investigation of a report, that was done in good faith, is not to the Whistleblower’s satisfaction, he/she has the right to report the event to the appropriate legal or investigative agency.
10. The identity of the Whistleblower, if known, shall remain confidential to those persons directly involved in applying this policy, unless the issue requires investigation by law enforcement, in which case members of the organization are subject to subpoena.