

**WHISTLEBLOWER POLICY OF
UNITED WAY OF GREATER FALL RIVER, INC.**

Adopted by the Board of Directors – April 13, 2005

Confirmed by the Board of Directors – March 16, 2018

The United Way of Greater Fall River's Whistleblower Policy is intended to provide a confidential, anonymous mechanism for employees to report inappropriate financial actions taken by management, without fear of retaliation.

Policy

Any UWGFR employee must be able to submit a confidential good faith complaint regarding accounting, internal auditing controls or auditing matters ("Accounting Complaints") to the appropriate senior staff or volunteer Chairs, without fear of dismissal or other retaliation of any kind. An Accounting Complaint may be submitted to any of the following persons by telephone or by letter addressed to any of them at United Way of Greater Fall River, 30 Bedford Street, P.O. Box 2550, Fall River, MA 02722.

- Chief Professional Officer
- Chair of the Board
- Chair, Finance Committee
- Chair, Personnel Committee

Confidential, anonymous Accounting Complaints submitted to one of the above should describe the matter at issue in as much detail as possible.

Procedure Overview

- Accounting Complaints received by the Chief Professional Officer or Personnel Committee Chair will promptly be forwarded to the Finance Committee Chair, who will record the receipt of all Accounting Complaints.
- The Finance Committee Chair will review and evaluate each Accounting Complaint and make an initial determination as to whether it should be investigated, and if so, may designate an appropriate UWGFR employee(s) and/or Finance Committee member to conduct such an investigation. In addition, the Finance Committee Chair has discretion to request, and the Board Chair has the authority to direct, special handling or investigation of any Accounting Complaint, including the retention of outside counsel or advisors.

- On not less than a quarterly basis, The Finance Committee Chair will report to the Finance Committee as to the status of Accounting Complaints that have been received. The Finance Committee has discretion to recommend corrective action to address issues brought to its attention by any Accounting Complaint. The Finance Committee Chair shall also report on Accounting Complaints to the Executive Committee and/or the Board of Directors
- The Finance Committee Chair, or designee, may contact persons submitting Accounting Complaints, if known and to the extent appropriate, to inform such persons of the results of any investigation and what, if any, corrective action has been recommended or taken.
- Records concerning Accounting Complaints will be retained by UWGFR for not less than three (3) years after the Accounting Complaint has been received.
- It shall be a violation of this policy, and grounds for disciplinary action, up to and including termination of employment for any UWGFR employee to discharge, demote, suspend, threaten, harass, or in any other matter retaliate against a UWGFR employee by reasons of his or her submission in good faith of an Accounting Complaint. This policy is not intended to, and does not create any rights, or any private right of action in any person.
- UWGFR retains its managerial discretion regarding the interpretation and application of this Policy. This Policy is subject to change and may be deleted, revised, or updated at any time with or without notice.
- This policy is effective upon approval by the UWGFR's Board of Directors and will apply to Accounting Complaints submitted under this Policy after its Effective Date.