

WHISTLEBLOWER POLICY

I. Introduction

This policy applies to all United Way of the Dutchess-Orange Region (UWDOR) employees, including part-time, temporary, volunteers, and contract employees

II. Purpose

UWDOR is committed to the highest possible standards of ethical, moral and legal business conduct. In line with the commitment and UWDOR's commitment to open communication, this policy aims to provide an avenue for employees to raise concerns and reassurance that they will be protected from reprisals or victimization for whistle blowing in good faith.

III. Policy

The whistle blowing policy is intended to cover serious concerns that could have a large impact on UWDOR, such as actions that:

- May lead to incorrect financial reporting;
- Are unlawful;
- Are not inline with UWDOR
- Otherwise amount to serious improper conduct.

IV. Safeguards

A. Harassment of Victimization

Harassment or victimization of the complainant will not be tolerated

B. 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.

C. Anonymous Allegations

The Policy encourages employees to include their names with allegations because appropriate follow-up questions and investigation may not be possible unless the source of the information is identified. Concerns expressed anonymously will be investigated, but consideration will be given to:

- The seriousness of the issue raised;
- The credibility of the concern; and
- The likelihood of confirming the allegation from attributable source.

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Acting in Good Faith

Anyone filing a complaint concerning a violation or suspected violation of the policy must be acting in good faith and have reasonable grounds for believing the information disclosed indicates a violation of the policy. Any allegations that prove not to be substantiated and which prove to have been maliciously or knowingly to be false will be viewed as a serious disciplinary offense.

V. Procedure

A. Process For Raising a Concern

1. Reporting Violations

As soon as you become reasonably concerned, you should first raise the issue with someone who can address it properly. In most cases, an employee's supervisor is in the best position to address and area of concern. However, if you are not comfortable speaking with your supervisor or you are not satisfied with your supervisor's response, you are encouraged to speak with anyone in management whom you are comfortable approaching. Supervisors and managers are required to report suspected violations of the policy to UWDOR's President/CEO, who has specific and exclusive responsibility to investigate all reported violations. For suspected fraud, or when you are not satisfied or uncomfortable with following UWDOR's reporting procedure, individuals should contact UWDOR's chairman of the Audit Committee, directly.

Concerns may be raised verbally or in writing. Employees who wish to make a written report should use the following format:

- the background and history of the concern(giving relevant dates);
- the reason why they are particularly concerned about the situation.

Employment-related concerns should continue to be reported through your normal channels such as your supervisor.

2. Timing

The earlier a concern is expressed; the easier it is to take action.

3. Evidence

Although the employee is not expected to prove truth of an allegation, the employee needs to demonstrate to the person contacted that there are sufficient grounds for concern.

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B. How the Complaint Will be Handled.

If the concern is raised verbally, the person receiving the information should put it in writing as soon as practicable to ensure that it properly reflects the concerns that have been raised. The employee must also indicate if the concern is to be treated in confidence. The limit of that confidence will be reviewed by the person receiving the information. The relevant person and/or the President will also ensure the legal counsel receives details for the employee's concerns for the purpose of corporate reporting and monitoring purposes.

Once you have told us of your concern, we will investigate it to assess initially what action should be taken. This may involve an internal inquiry or a more formal investigation. We will tell you who may be handling the matter, how you can contact him/her and whether your further assistance may be needed. If you request it, we will write to you summarizing your concern(s) and setting out how we propose to handle it.

C. Report to Complainant

While the purpose of this Policy is to enable us to investigate possible malpractice and take appropriate steps to deal with it, we will give you as much feedback as we properly can. If requested, we will confirm our response to you in writing. Please note, however, that we may not be able to tell you the precise action we take where this would infringe a duty of confidence owed by us to someone else.

Subject to any legal constraints, the relevant employee will normally be informed of all the final outcome of any investigation.