

529 Whistleblower Policy: Reporting Suspected Violations of Law and Policy

The Early Learning Coalition of Indian River, Martin and Okeechobee Counties requires directors, officers and employees to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. As employees and representatives of the Coalition, we must practice honesty and integrity in fulfilling our responsibilities and comply with all applicable laws and regulations.

a. Reporting Responsibility

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

b. No Retaliation

No director, officer or employee who in good faith reports a violation 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. This Whistleblower Policy is intended to encourage and enable employees and others to raise serious concerns within the Coalition prior to seeking resolution outside the Coalition.

c. Reporting Violations

The Coalition's open-door policy suggests that employees share their questions, concerns, suggestions or complaints with someone who can address them properly. In most cases, an employee's supervisor is in the best position to address an 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 the Operations Designee or anyone in management whom you are comfortable in approaching. Supervisors and managers are required to report suspected violations to the Chief Executive Officer, who has specific and exclusive responsibility to investigate all reported violations. For suspected fraud, or when you are not satisfied or comfortable with following the Coalition's open-door policy, individuals should contact the Chief Executive Officer. When this reporting policy is inappropriate for a particular situation, the Coalition Board Chair or any member of the Executive Committee can be contacted directly. The contact information for the Board Chair is distributed to all staff and also posted on the Coalition website.

d. Compliance Officer

The Chief Executive Officer acts as the Compliance Officer and is responsible for investigating and resolving all reported complaints and allegations concerning violations at his/her discretion and shall advise the Finance Committee. The Chief Executive Officer has direct access to the Finance Committee of the Board of Directors and is required to report to the Finance Committee at least annually on compliance activity.

e. Accounting and Auditing Matters

The Finance Committee of the board of directors shall address all reported concerns or complaints regarding corporate accounting practices, internal controls or auditing. The Coalition Finance Director shall immediately notify the Finance Committee of any such complaint and work with the committee until the matter is resolved. *Cont'd on page 2*



f. Acting in Good Faith

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. 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.

g. 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.

h. Handling of Reported Violations

The Chief Executive 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.

i. Handling of Documentation

It is a crime to alter, cover up, falsify, or destroy any document that may be relevant to an official investigation.