

CORVALLIS SUSTAINABILITY COALITION

Whistleblower Protection Policy

Article I **Purpose**

The purpose of this Whistleblower Protection Policy is to: (1) encourage volunteers, agents, consultants, and employees to come forward with credible information on suspected illegal practices or violations of policies adopted by the Corvallis Sustainability Coalition (the “Coalition”); (2) reassure that the Coalition will protect the person coming forward from retaliation; and (3) provide procedures on how to report suspected illegal practices or violations of Coalition policies.

The Coalition requires volunteers, agents, consultants, and employees to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. As representatives of the Coalition, volunteers, agents, consultants, and employees must practice honesty and integrity in fulfilling their responsibilities and comply with all applicable laws and regulations.

Article II **Reporting Responsibility**

The Coalition encourages good faith complaints, reports or inquiries about illegal practices or violations of the Coalition’s policies, including illegal or improper conduct by the Coalition itself, by its leadership, or by others on its behalf. Appropriate subjects to bring forward under this policy include financial improprieties, accounting or audit matters, ethical violations, or other similar illegal or improper practices or policy violations. Other subjects on which the Coalition has existing complaint mechanisms should be addressed under those mechanisms.

This Whistleblower Policy is intended to encourage and enable employees and others to raise serious concerns internally so that the Coalition can address and correct inappropriate conduct. It is the responsibility of all Coalition volunteers, agents, consultants, and employees to report concerns about suspected violations of the Coalition’s policies or laws or regulations that govern the Coalition’s operations.

Article III **No Retaliation**

It is contrary to the values of the Coalition or anyone acting on its behalf to retaliate against any Coalition volunteer, agent, consultant or employee who in good faith makes a complaint, report or inquiry regarding a suspected violation of a policy adopted by the Coalition, a suspected violation of law, a suspected violation of any regulation governing the operations of the Coalition, or against someone participating in a review or investigation under this policy. A volunteer, agent, consultant or employee who retaliates against someone who has reported a violation in good faith is subject to discipline up to and including termination of employment.

Article IV

Reporting Procedure

Anyone with credible information regarding suspected illegal practices or violations of Coalition policies should document any incidents involving prohibited conduct and bring this to the immediate attention of the Coalition Facilitator. Complaints, reports, or inquiries made under this policy should be in writing and describe in detail the specific facts demonstrating the bases for complaint, report, or inquiry. The Coalition has an open-door policy and suggests that any Coalition volunteer, agent, consultant or employee share their questions, concerns, suggestions, or complaints under this policy with the Coalition Facilitator. If the complaint, report, or inquiry is about the Coalition Facilitator, it should be made to the Vice Facilitator. Complaints, reports, or inquiries under this policy may be directed to the Coalition Facilitator at info@sustainablecorvallis.org or to the Vice Facilitator using contact information provided on the Coalition's website at <https://sustainablecorvallis.org/about/leadership/>.

Article V

Investigation and Facilitator Reporting

The Coalition's Facilitator is responsible for ensuring that all complaints about unethical or illegal conduct are investigated and resolved as is reasonable and appropriate. If a complaint, report, or inquiry is made under this policy against the Coalition Facilitator, the Vice Facilitator will take over this role.

The Coalition Facilitator and/or Vice Facilitator (as appropriate) will promptly investigate all complaints, reports, or inquiries made under this policy to the extent possible based on the information available. While all complaints about unethical or illegal conduct and any information gathered in an investigation will be handled with the strictest confidence, the investigation may require disclosure of the identity of those connected to the complaint or of information which could lead to the identification of persons connected to the complaint.

In the event a complaint, report, or inquiry is made under this policy, the Coalition Facilitator will advise the Steering Committee immediately. The Coalition Facilitator should advise the Steering Committee of the general facts of any complaint, report, or inquiry made under this policy, including but not limited to: who was involved, when the incident took place, the nature of the complaint or inquiry, and the resolution. If no issues have arisen under this policy in the annual reporting period, the Coalition Facilitator will provide an annual report to the Steering Committee explaining that no issues have arisen under this policy within the relevant timeframe.

The Coalition Facilitator will report at least annually to the Treasurer on compliance activity relating to accounting or alleged financial improprieties. In the event that no issues arise under this policy, the Coalition Facilitator will include in the annual report to the Treasurer that no issues have arisen in the relevant timeframe.

Article VI

Accounting and Auditing Matters

The Coalition Facilitator (or Vice Facilitator, as appropriate) shall immediately notify the Finance Committee of any concerns or complaints regarding the organization's accounting practices, internal controls, or auditing and work with the committee until the matter is resolved.

Article VII

Acting in Good Faith

Anyone filing a complaint, report, or inquiry concerning a violation or suspected violation must be acting in good faith and have reasonable grounds for believing the information disclosed indicates a violation. 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. The Coalition reserves the right to take disciplinary action against anyone found to have made a bad faith, knowingly false complaint, report or inquiry, or who otherwise abuses this policy.

Article VIII
Confidentiality

Complaints, reports, or inquiries under this policy may be made on a confidential or anonymous basis. Volunteers, agents, consultants, and employees must recognize that the Coalition may be unable to fully evaluate a vague or general complaint, report, or inquiry that is made anonymously.

Article IX
Handling of Reported Violations

The Coalition Facilitator will notify the person who submitted a complaint, report, or inquiry and acknowledge receipt of the reported violation or suspected violation. All reports will be promptly investigated and appropriate corrective action will be taken if warranted by the investigation.

Article X
Certification

This policy was approved at a meeting of the Steering Committee on November 12, 2020.

Verified by 
Cynthia Lolik, Secretary
Corvallis Sustainability Coalition