UNITED WAY OF ALLEN COUNTY

United Way of Allen County Whistleblower Protection Policy

United Way of Allen County 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 United Way of Allen County, we must practice honesty and integrity in fulfilling our responsibilities and comply with all applicable laws and regulations.

Reporting Responsibility

This Whistleblower Policy is intended to encourage and enable employees and others to raise serious concerns internally so that United Way of Allen County can address and correct inappropriate conduct and actions. It is the responsibility of all board members, officers, employees, and volunteers to report concerns about violations of United Way of Allen County's code of ethics or suspected violations of law or regulations that govern the organization's operations.

No Retaliation

It is contrary to the values of United Way of Allen County for anyone to retaliate against any board member, officer, employee or volunteer who in good faith reports an ethics violation, or a suspected violation of law, such as a complaint of discrimination, or suspected fraud, or suspected violation of any regulation governing the operations of the organization. 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.

Reporting Procedure

United Way of Allen County has an open-door policy and suggests that employees share their questions, concerns, suggestions or complaints with their supervisor. 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 President/CEO, the Chair of the Board of Directors or the Immediate Past Board Chair. Whomever you speak with, it is important that you bring it to someone's attention.

Supervisors and managers are required to report complaints or concerns about suspected ethical and legal violations in writing to the United Way of Allen County's Immediate Past Board Chair, who has the responsibility to investigate all reported complaints. Employees with concerns or complaints may also submit their concerns in writing directly to their supervisor or the Executive Director or the organization's Immediate Past Board Chair.

Effective September 9, 2021 1/2

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UNITED WAY OF ALLEN COUNTY

Compliance Officer

The Immediate Past Board Chair will serve as the United Way of Allen County's Compliance Officer. In this role the Immediate Past Board Chair is responsible for ensuring that all complaints about unethical or illegal conduct are investigated and resolved. They will advise the President/CEO and/or the Board Chair of all complaints and their resolution and will report at least annually to the Audit Committee on compliance activity relating to accounting or alleged financial improprieties.

Accounting and Auditing Matters

The United Way of Allen County's Immediate Past Board Chair shall immediately notify the Audit Committee of any concerns or complaint regarding corporate accounting practices, internal controls or auditing and work with the committee until the matter is resolved.

Acting in Good Faith

Anyone filing a written 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. 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.

Confidentiality

Violations or suspected violations may be submitted on a confidential basis by the complainant. Reports of violations or suspected violations will be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation.

Handling of Reported Violations

The United Way of Allen County's Immediate Past Board Chair will notify the person who submitted a complaint 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.

Compliance Officer, Immediate Past Board Chair:

Sue Ehinger smehinger@gmail.com

Effective September 9, 2021 2/2

