

C4SO WHISTLEBLOWER POLICY

If you see something, say something!

Whistleblower Policies are meant to provide a way for employees or volunteers of an organization who observe or experience wrongdoing to be empowered to report it. C4SO's Whistleblower Policy provides important information for any persons outlined below who believe that illegal or unethical practices are taking place within C4SO to report such observations.

A. Application. This Whistleblower Protection Policy applies to all of the Diocese of Churches for the Sake of Others' (the Organization's) staff, whether full-time, part-time, or temporary employees, to all volunteers, to all who provide contract services, and to all officers and directors, each of whom shall be entitled to protection ("protected persons").

B. Reporting Credible Information. A protected person shall be encouraged to report information relating to illegal practices or violations of policies of the Organization (a "Violation") that such person ("the reporter") in good faith has reasonable cause to believe is credible. A violation constitutes breaking a state or federal statute, noncompliance with a state or federal rule or regulation, or unsafe working conditions or work practices in the employee's or volunteer's work/volunteer environment. Information shall be reported to the local Rector (the "Compliance Officer"), unless the report relates to the Compliance Officer, in which case the report shall be made to the local Dean which shall be responsible to provide an alternative procedure. If the Dean is unknown to the reporter, contact the Diocese and ask who the local Dean is. If the Dean is also the local rector, ask for another Dean in closest proximity to the reporter's church.

Anyone reporting a Violation must act in good faith, and have reasonable grounds for believing that the information shared in the report indicates that a Violation has occurred.

C. Investigating Information. The Compliance Officer shall promptly investigate each such report and prepare a written report to C4SO's Executive Leadership Team. In connection with such investigation all persons entitled to protection shall provide the Compliance Officer with credible information. All actions of the Compliance Officer in receiving and investigating the report and additional information shall endeavor to protect the confidentiality of all persons entitled to protection.

D. Confidentiality. The Organization encourages anyone reporting a Violation to identify himself or herself when making a report in order to facilitate the investigation of the Violation. However, reports may be submitted anonymously by filling out a "Whistleblower Reporting Form" and mailing it to Kimberley Pfeiler, Ombudsman.

Reports of Violations or suspected Violations will be kept confidential to the extent possible, with the understanding that confidentiality may not be maintained where identification is required by law or in order to enable the Organization or law enforcement to conduct an adequate investigation.

E. Protection from Retaliation. No person entitled to protection shall be subjected to retaliation, intimidation, harassment, or other adverse action for reporting information in accordance with this Policy. Any person entitled to protection who believes that he or she is the subject of any form of retaliation for such participation should immediately report the same as a violation of and in accordance with this Policy.

Any individual within the Organization who retaliates against another individual who has reported a Violation in good faith or who, in good faith, has cooperated in the investigation of a Violation is subject to discipline, including termination of employment or volunteer status.

F. Dissemination and Implementation of Policy. This Policy shall be disseminated in writing to all affected constituencies. The Organization shall adopt procedures for implementation of this Policy, which may include:

- (1) documenting reported Violations;
- (2) working with legal counsel to decide whether the reported Violation requires review by the Compliance Officer or should be directed to another person or department;
- (3) keeping the Executive Leadership Team informed of the progress of the investigation;
- (4) interviewing employees;
- (5) requesting and reviewing relevant documents, and/or requesting that an auditor or counsel investigate the complaint; and
- (6) preparing a written record of the reported Violation and its disposition, to be retained for a specified period of time.

The procedures for implementation of this Policy shall include communicating with the reporter about the status of the reported Violation, to the extent that the reporter's identity is disclosed, and to the extent consistent with any privacy or confidentiality limitations. However, due to privacy the resolution of the situation may be undisclosed to the reporter.

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