**SAMPLE LAND TRUST**

WHISTLEBLOWER POLICY

Sample Land Trust, Inc. (“*the* *Corporation*”) requires directors, officers, advisors and employees (each such person, individually, a “*Land* *Trust* *Representative*” and all of such persons, collectively, “*Land* *Trust* *Representatives*”) to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. The Corporation and the Land Trust Representatives are committed to operating the affairs of the Corporation in furtherance of its tax-exempt purposes and in compliance with all applicable laws, rules and regulations, including those concerning accounting and auditing.

**DEFINITIONS**

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| **Whistleblower:** | a Land Trust Representative who (a) reports an activity that he/she considers to be illegal or dishonest in accordance with this policy, and/or (b) participates in good faith in any investigation or proceeding resulting from a report of the nature described in (a) above. |
| **Illegal** **or** **Dishonest** **Activities:** | violations of federal, state or local laws; willful misuse of funds; and fraudulent financial reporting. |

**PRACTICE/PROCEDURE**:

1. If a Land Trust Representative has knowledge of or a reasonable concern of any Illegal or Dishonest Activity, that person shall contact the Board of Directors through its President or another member of the Executive Committee. Once that contact has been made, such person shall be considered to be a Whistleblower for the purposes of this Policy.
2. All reports of Illegal or Dishonest Activities will be promptly investigated by the Corporation’s Executive Committee, with documentation kept of such investigation. The person alleged to be involved in the Illegal or Dishonest Activity shall not participate in the investigation or vote on any sanction or other action deemed appropriate by the Board. The Whistleblower is not responsible for investigating the activity or for determining fault or corrective measures. This Policy applies to any matter that is related to the conduct of the Corporation’s activities and does not relate to private acts of an individual not connected to such activities.
3. Whistleblower protections are provided in two important areas: confidentiality and assurances of no retaliation. Insofar as possible, the confidentiality of the Whistleblower will be maintained. However, identity may have to be disclosed to conduct a thorough investigation, to comply with any applicable law and/or to provide accused individuals their legal rights of defense.
4. The Corporation will not retaliate against a whistleblower. The right of protection against retaliation does not include immunity for any personal wrongdoing that is alleged and investigated, including, without limitation, intentionally filing a false report of wrongdoing.