**Policy 1.5 Whistleblower Protection**

**Committee Responsible**: Executive Committee

**Adopted**: **[DATE]**

**Amended**: **[DATE]**

**Purpose**The Land Trust requires its Directors, employees, independent contractors and volunteers to observe high standards of business and personal ethics and act with honesty and integrity when conducting their duties and responsibilities on behalf of the Land Trust. As such, Directors, employees, independent contractors, and volunteers are required to disclose all illegal or unethical conduct that occurs in connection with the Land Trust’s finances or other aspects of its operations.

**Policy**

**Reporting Required**

All Directors, employees, independent contractors, and volunteers of the Land Trust must promptly report to either the President of the Board or the Executive Director any of the following situations of which the Directors, employees, independent contractors, and volunteers becomes aware or has reason to believe may exist: (1) violations of any applicable federal, state or local law or regulation; (2) violations of any material policy of the Land Trust, described in the Land Trust Board Manual; (3) any questionable or improper matters regarding bookkeeping, accounting, internal accounting controls, or auditing matters; or (4) inappropriate handling or resolution of any complaint or matter previously reported under this Policy. At the Director’s, employee’s, independent contractor’s or volunteer’s discretion, and if the circumstances warrant, reports regarding the aforementioned conduct may be made directly to any of the Land Trust’s officers or Directors. Reports under this Policy will be taken seriously and investigated promptly. Appropriate corrective action, up to and including termination of contract, will be taken if warranted by the investigation into the reported conduct or for violations of this Policy.

**Retaliation Prohibited**No Directors, employees, independent contractors or volunteers may take any action that is harmful to an employee, independent contractor or volunteer, discharge, demote, suspend, threaten, harass or in any manner discriminate against an employee, independent contractor or volunteer in the terms and conditions of contract because of any lawful act done by the employee, independent contractor or volunteer: (1) to report any matter that the employee/independent contractor/volunteer reasonably believes must be reported under this Policy; (2) to participate in an investigation by a regulatory authority, law enforcement agency, member or committee of Congress, or any person with supervisory authority over the employee/independent contractor/volunteer or who has the authority to investigate reports under this Policy; (3) to report truthful information relating to any state or federal offense to a law enforcement officer; or (4) to provide information, cause information to be provided, or otherwise assist in an investigation regarding any conduct that the employee/independent contractor/volunteer reasonably believes constitutes a violation of applicable law or fraud, when the investigation is brought by a governmental, regulatory, or law enforcement agency, a member or committee of Congress, a person with supervisory authority over the employee, or such other person working for the Land Trust who has the authority to investigate, discover, or terminate improper conduct.

Any employee/independent contractor/volunteer who has reason to believe that he or she has been subject to retaliation for making a report or participating in an investigation under this Policy must immediately report such alleged retaliation in accordance with this Policy. Any employee/independent contractor/volunteer who retaliates against another employee/independent contractor/volunteer for making a report or participating in an investigation under this Policy will be subject to disciplinary action, up to and including termination of contract.