

The S.O.A.P. Project WHISTLEBLOWER POLICY

The S.O.A.P. Project requires directors, officers, employees and volunteers to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. As employees and representatives of the Organization, 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 the Organization 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 the Organization's Code of Ethics and policies or suspected violations of law or regulations that govern the Organization's operations.

No Retaliation

It is contrary to the values of the Organization for anyone to retaliate against any board member, officer, employee or volunteer who in good faith reports a violation of the Organization's Code of Ethics, policies, or a suspected violation of law, such as a complaint of discrimination, or suspected fraud, or suspected violation of any law or regulation governing the operations of the Organization. An employee or volunteer who retaliates against someone who has reported a violation in good faith is subject to discipline up to and including termination of employment or volunteer status.

Reporting Procedure

Directors, officers, employees and volunteers should share their questions, concerns, suggestions or complaints with someone who can address them properly. In most cases, employees and volunteers should report to Executive Leadership or the Board Chair. However, if an employee or volunteer is not comfortable speaking with these individuals or is not satisfied with the response, that employee or volunteer is encouraged to report to any director of the Organization.

Acting in Good Faith

Any good faith report, concern or complaint is fully protected by this policy, even if the report, question or concern is, after investigation, not substantiated. Anyone filing a 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 of the Organization's Code of Ethics, policies or applicable law. Any allegations that prove not to be substantiated and have been made maliciously or with knowledge that they were false will be treated as a serious disciplinary offense.

Confidentiality

Upon the request of the complainant, the Organization will use its best efforts to protect the confidentiality of the complainant for any good faith report. Violations or suspected violations

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may be submitted on a confidential basis by the complainant. They may also be submitted anonymously by *filling out a "Whistleblower Reporting Form" and mailing the report to the Executive Leadership or Board Chair*. 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.

Handling of Reported Violations

All reports will be promptly investigated, and appropriate corrective action will be taken if warranted by the investigation. The complainant will be informed that follow-up has or is occurring within two weeks after Executive Leadership or Board Chair has received the complaint or report. *(The Board's Executive Committee shall be informed of all such complaints or reports.)*

