



WHISTLEBLOWER POLICY

Policy Statement:

It is the policy of the Boys and Girls Club of the Peninsula to observe high standards of business and personal ethics. Employees, volunteers, and other stakeholders of the organization must practice honesty and integrity in fulfilling their responsibilities and comply with all applicable laws and regulations. It is the responsibility of all employees, volunteers, and other stakeholders to report violations or suspected violations.

The objectives of the Boys and Girls Club of the Peninsula Whistleblower Policy are to establish policies and procedures for:

- The reporting of questions, concerns, or complaints by employees, volunteers, and other stakeholders of the organization, on a confidential and anonymous basis.
- The treatment of concerns received.
- The protection of those reporting concerns from retaliatory actions.

Submission of Concerns:

Employees, volunteers and other Stakeholders need to share their questions, concerns, suggestions or complaints with someone who can address them properly.

Employees

Employees should first discuss their concern with their immediate supervisor. If after speaking with their immediate supervisor, the employee is not satisfied with the supervisor's response the employee should report the concern to the Human Resources Director. If the individual is not comfortable speaking with his or her supervisor, the individual should go directly to the Human Resources Director with the concern.

Volunteers and Other Stakeholders

Volunteers and other stakeholders should report their concerns to the Human Resources Director.

If a person is not comfortable taking their concern to their supervisor or the Human Resources Director, they should go directly to the Executive Director

and/or the President of the Board of Directors. Concerns may also be submitted anonymously.

Handling of Reported Violations:

The Human Resources Director is responsible for promptly investigating and resolving all reported concerns and for communicating the status of the investigation to the person who initially made the complaint. The Human Resources Director shall advise the Executive Director and/or the President of the Board of Directors if they suspect a violation has been committed. The Human Resources Director is required to promptly submit any concerns regarding accounting practices, internal controls, or auditing to the Chair of the Audit Committee. It is the responsibility of the audit committee to investigate those concerns and to recommend appropriate corrective action to the Board of Directors.

Protection of Whistleblowers:

Confidentiality

Reports of concerns and investigations will be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation. Disclosure of reports of concerns to individuals not involved in the investigation will be viewed as a serious disciplinary offense that could result in disciplinary action up to and including termination. Such conduct may also give rise to other actions, including civil lawsuits.

No Retaliation

The Whistleblower policy is intended to encourage and enable employees, volunteers, and other stakeholders to raise concerns in good faith without being subject to retaliation, including adverse employment consequences. Representatives of BGCP Management are prevented from interfering with the right of an employee or volunteer to blow the whistle.

Furthermore, disciplinary action up to and including termination may be taken against an employee, volunteer, or other stakeholder who retaliates against someone who has reported a concern in good faith.