

# WHISTLEBLOWER POLICY

#### General

Meals on Wheels North Central Texas requires Trustees, officers and employees to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. As employees and representatives of Meals on Wheels, honesty and integrity must be practiced in fulfilling everyone's responsibilities and to comply with all applicable laws and regulations. It is the intent of Meals on Wheels to adhere to all laws and regulations that apply to the organization. The underlying purpose of this policy is to support the organization's goal of legal compliance. The support of all Trustees, officers and employees is necessary to achieving this.

### **Reporting Responsibility**

It is the responsibility of all Trustees, officers and employees to report violations or suspected violations of federal, state, or local laws or regulations, including financial wrongdoing, in accordance with this Whistleblower Policy.

### No Retaliation

No Trustee, officer or employee who in good faith reports an ethics violation shall suffer harassment, retaliation or adverse employment consequence. An employee who retaliates against someone who has reported a violation in good faith is subject to discipline up to and including termination of employment. This Whistleblower Policy is intended to encourage and enable employees and others to raise serious concerns within Meals on Wheels prior to seeking resolution outside of the organization.

### **Reporting Violations**

Meals on Wheels has an open door policy and suggests that Trustees, officers or employees share their questions, concerns, suggestions or complaints with the person(s) who can address them properly. In most cases, the executive director, the Chairperson of the Board of Trustees or an employee's supervisor is in the best position to address an area of concern. If anyone reasonably believes that some policy, practice, or activity of Meals on Wheels is in violation of law, a written complaint must be filed by that employee with the Executive Director or the Chairperson of the Board of Trustees.

### **Compliance Officer**

A Compliance Officer will be selected by the Board of Trustees to investigate any written complaint. The Compliance Officer is responsible for investigating and resolving all reported complaints and allegations concerning violations and, at his/her discretion, shall advise the Chairperson and/or the Executive Director and/or the entire Board of Trustees and/or the Executive Committee of the Board of Trustees for further action to address the complaint.

### Acting in Good Faith

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. Any allegations that prove not to be substantiated and which prove to have been made maliciously or knowingly to be false will be viewed as a serious disciplinary offense.

### Confidentiality

Violations or suspected violations may be submitted on a confidential basis by the complainant or may be submitted anonymously. Reports of violations or suspected violations will be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation.

## Handling of Reported Violations

The Compliance Officer will notify the sender and acknowledge receipt of the reported violation or suspected violation within five business days. All reports will be promptly investigated and appropriate corrective action will be taken if warranted by the investigation.