



Dan and Margaret Maddox Fund Whistleblower Policy

Purpose of Whistleblower Policy

The purpose of this policy is to maintain an environment where employees, board members, consultants, volunteers, applicants and grantees are free to raise good faith concerns regarding the Dan and Margaret Maddox Fund's business practices, specifically:

- reporting suspected violations of law on the part of the Maddox Fund, including, but not limited to, state code, federal laws and regulations;
- providing truthful information in connection with an inquiry or investigation by a court, agency, law enforcement or other governmental body;
- identifying and reporting internally potential violations of the Maddox Fund's own policies or compromised ethical or business standards.

Procedure

If any employee, board member, consultant, volunteer, applicant or grantee reasonably believes that some policy, practice, or activity of the Maddox Fund is in violation of law, a written complaint must be filed through the Maddox Fund's whistleblower hotline. Instructions on how to access the hotline will be posted on the Maddox Fund's Web site. Upon receipt of a complaint the whistleblower hotline will forward the complaint to the board chair, the chair of the audit committee and the Executive Director. If any or all of the individuals designated to receive a complaint are implicated in the alleged violation, the hotline representative will not send the complaint to them but will instead adhere to the following chain of command until at least three independent Maddox Fund representatives are notified: the Board Chair, the Audit Committee Chair, the Board Vice Chair, Treasurer, Secretary or any other Board member.

It is the intent of the Maddox Fund to adhere to all laws and regulations that apply to the organization, and the underlying purpose of this policy is to support the organization's goal of legal compliance. The support of all employees, board members, consultants, volunteers, applicants and grantees is necessary to achieve compliance with various laws and regulations. All employees, board members, consultants, volunteers, applicants and grantees are protected from retaliation only if they bring the alleged unlawful activity, policy or practice to the attention of the Maddox Fund, and provide the Maddox Fund with a reasonable opportunity to investigate and correct the alleged unlawful activity. The protection described below is only available to reporting parties who comply with this requirement.

Good Faith

Anyone filing a complaint concerning a violation or suspected violation of the law must be acting in good faith and have reasonable grounds for believing the information disclosed indicates a violation. Any allegation that proves to have been made maliciously, or knowingly to be false, will be viewed as a serious disciplinary offense.

Retaliation

The Maddox Fund will not retaliate against any employee, board member, consultant, volunteer, applicant or grantee who, in good faith, has made a protest or raised a complaint against some practice of the Maddox Fund, or of another individual or entity with whom the Maddox Fund has a business relationship, on the basis of a reasonable belief that the practice is in violation of a law or a clear mandate of public policy.

The Maddox Fund will not retaliate against any employee, board member, consultant, volunteers, applicant or grantee who discloses, or plans to disclose to a supervisor, any activity, policy or practice of the Maddox Fund that they reasonably believe is in violation of a law, a rule or a regulation mandated pursuant to a law, or is in violation of a clear mandate of public policy concerning the health, safety, welfare or protection of the environment.

Handling of Reported Violations

The full Audit Committee will be informed of any written complaint at the time it is made.

The complaint will be properly investigated by the Audit Committee in a timely manner and a response will be given to the individual making the complaint. If the complaint is made anonymously, the Chair of the Audit Committee will work through the whistleblower hotline feedback process for communication with the anonymous claimant.

All reports will be promptly investigated by the Audit Committee and appropriate corrective action will be recommended to the Board, if warranted by the investigation. The Audit Committee must receive Board approval to retain outside legal counsel, accountants, private investigators or any other resource deemed necessary to conduct a full and complete investigation of the allegations.

If the Audit Committee response is not satisfactory, an appeal may be made to the Executive Committee. If deemed prudent by the Executive Committee the complaint will be considered by the full Board of Directors.

The response of the Board of Directors will be final.

After each complaint, the Board of Directors will consider any policy or procedure changes that might prevent future issues or concerns.

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 offence and may result in discipline up to and including termination of employment or removal from the Board of Directors.

Approved: August 24, 2009

Updated 1-1-2010: Text changed to update organization name and related text.

Update 7-22-2013: Established a Whistleblower Hotline and added applicants and grantees to stakeholders.

Update 2020: New Name