



## WHISTLEBLOWER POLICY

The Regional Food Bank of Oklahoma is committed to the highest possible standards of ethical, moral and legal conduct. This policy aims to provide an avenue for employees to raise concerns and reassurance that they will be protected from reprisals or victimization for whistleblowing in good faith.

The whistleblowing policy is intended to cover serious concerns that could have a large impact on the Food Bank, such as actions that:

- May lead to incorrect financial reporting;
- Are unlawful;
- Are not in line with company policy, including the Code of Ethics; or
- Otherwise amount to serious improper conduct.

### **SAFEGUARDS**

**Harassment or Victimization:** of the complainant will not be tolerated.

**Confidentiality:** Every effort will be made to protect the complainant's identity.

**Anonymous Allegations:** The policy encourages employees to put their names to allegations because appropriate follow-up questions and investigation may not be possible unless the source of the information is identified. Concerns expressed anonymously will be investigated, but consideration will be given to:

- The seriousness of the issue raised;
- The credibility of the concern; and
- The likelihood of confirming the allegation from attributable sources.

**Malicious Allegations:** may result in disciplinary action.

### **PROCEDURE**

**Reporting:** The whistleblowing procedure is intended to be used for serious and sensitive issues. Serious concerns relating to financial reporting, unethical or illegal conduct should be reported through Executive Director or any Board of Directors Chair.

Employment-related concerns should be reported through the normal channels such as your supervisor, Human Resources, Executive Director or any Board of Directors Chair.

**Timing:** The earlier a concern is expressed, the easier it is to take action.

**Evidence:** Although the employee is not expected to prove the truth of the allegation, the employee needs to demonstrate to the person contacted that there are sufficient grounds for concern.

### **HOW THE COMPLAINT WILL BE HANDLED**

The action taken will depend on the nature of the concern. As appropriate, complaints shall be forwarded to Legal Counsel. Additionally, the Audit Committee of the Board of Directors will receive a copy of the complaint if the complaint is fiscal in nature. Once a complaint is received, an investigation will be conducted, with all follow-up actions posted. The complainant will be given the opportunity to receive follow-up on their concern.