

Document Name:	Whistleblower Policy
Purpose:	The purpose of this policy is to support the La Crosse Community Foundation's (the "Foundation's") commitment to adhere to all laws and regulations that apply to the Foundation and to ensure compliance with the Foundation's adopted policies.
LCF Board Approval Date:	11/17/2010
Revision Date:	
National Standards Requirement:	Yes

## POLICY

---

The Foundation requires all directors, officers, committee members, employees, volunteers, vendors, consultants, and other outside parties that work with the Foundation to report any suspected illegal practices or violations of adopted policies as outlined in this policy and will protect reporters from retaliation.

### I. Reporting Responsibility and Where to Report

If any director, officer, committee member, employee or volunteer reasonably believes in good faith that 1) some policy, practice or activity of the Foundation is illegal or 2) that some practice or activity is in material violation of Foundation policy, including material violations of the Foundation's Personnel Policies, a written complaint must be filed by that individual with the Executive Director or the Board Chairman. If both the Executive Director and Board Chairman are believed to be involved in the matter to be reported, then the individual shall file the written complaint with any member of the Executive Committee. The types of concerns that should be reported include, but are not limited to, the following examples: self-dealing, falsifying financial information, discrimination or harassment, embezzlement, material violation of a Foundation policy, such as confidentiality and conflicts of interest, providing false information to or withholding material information from auditors or directors. If an individual covered under this policy is unsure whether a policy, practice or activity is illegal or a material violation of the Foundation's Personnel Policies, the covered individual should err on the side of reporting.

### II. Retaliation Prohibited

The Foundation prohibits retaliation, including harassment, intimidation, adverse employment actions, or any other form of retaliation, against individuals who raise suspected violations as provided in this policy in good faith or cooperate in inquires or investigations. Any individual who retaliates against someone contrary to this policy is subject to disciplinary action up to and including termination from his or her position with the Foundation. Any individual who believes that he or she has been subjected to any form of retaliation as a result of reporting a suspected violation of this policy must immediately report the retaliation as provided in this policy (see Section II, Reporting Responsibility and Where to Report).

**III. Investigation**

Reports of suspected violations of law or Foundation policy will be investigated promptly by an investigative committee consisting of at least three members of the Executive Committee selected by the Board Chairman. The investigative committee will determine whether the allegations are true and what, if any, corrective action is needed. The committee will notify the concerned individuals, including the complainant if known, of their finding, will prepare a report on the findings and will determine if the allegations should be referred to law enforcement officials. The report will be presented to the Executive Committee and the Board of Directors.

**IV. Executive Committee**

Any individual receiving a written complaint under this policy shall immediately notify the Executive Committee of the complaint. The Executive Committee will review the investigative committee report and shall address all concerns or complaints regarding Foundation accounting practices, internal controls or auditing.

**V. Acting in Good Faith**

Any allegations that prove 1) to be unsubstantiated and 2) to have been maliciously or when known to have been false will be viewed as a serious disciplinary offense that may lead to the termination of that individual's position with the Foundation.

**VI. Confidentiality**

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