

MENNONITE VILLAGE POLICY & PROCEDURE

TITLE: Whistleblower Policy PROCEDURE NO: HR 500.10
REPLACES: None PAGE(S): _____
PREPARED BY: Kristen Gregory, HR Director DATE: August 2018
APPROVED BY: Ron Litwiller DATE: August 14th, 2018

PURPOSE:

Oregon whistleblower law makes it an unlawful employment practice for an employer to discharge, demote, suspend or in any manner discriminate or retaliate against an employee with regard to promotion, compensation or other terms, conditions or privileges of employment for the reason that the employee has in good faith reported information that the employee believes is evidence of a violation of a state or federal law, rule or regulation.

Mennonite Village is committed to high standards of ethical, moral and legal business conduct. In line with this commitment, and the company's commitment to open communication, this policy provides an avenue for staff to raise concerns and reassurance that they will be protected from reprisals or victimization for whistleblowing.

POLICY:

This whistleblowing policy is provides protections for individuals performing work on behalf of the Company if they raise concerns regarding the Company, such as:

- Incorrect financial reporting;
- Unlawful activity;
- Activities that are not in line with Company policy, including its Code of Conduct and the Compliance and Ethics Program; or
- Activities, which otherwise amount to serious improper conduct.

Any crimes against person or property, such as assault, rape, burglary, etc. should immediately be reported to local law enforcement personnel and area administrator and/or director.

PROCEDURE:

The whistleblower should promptly report the suspected or actual event to their supervisor. The whistleblower can report the event with their identity or anonymously. Due to the nature of anonymous reporting, individuals who do not provide their identity

forfeit the opportunity for the Company to provide a follow-up response. Individuals who choose to identify themselves will receive a personal, confidential follow-up within 14 business days of the initial report that specifies the organization's response within legal and confidentiality requirements. The individual will also receive a communication when all investigations are over, also within confidentiality and legal requirements. This communication will come from the supervisor or appropriate administrator.

The Company will only report those details that do not violate the confidentiality of any other parties involved.

The whistleblower shall receive no retaliation or retribution for a report that was provided in good faith – that was not done primarily with malice to damage another or the Company.

Anyone who retaliates against a whistleblower will be subject to disciplinary action up to and including termination.

Supervisors, managers and/or Board members who receive the reports must promptly act to investigate and/or resolve the issue.

If the whistleblower is uncomfortable or otherwise reluctant to report to their supervisor, then the whistleblower should report the event to the Compliance and Privacy Hotline (1-800-211-2713). While not entirely anonymous this provides another avenue for addressing concerns. The whistleblower policy above applies entirely to the Compliance and Privacy Hotline policy as well.