

The Santa Fe Conservation Trust Whistleblower Policy

Policy #

Adopted: (unknown)

Updated: October 19, 2018

General

Santa Fe Conservation Trust (SFCT) requires directors, officers and employees to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. Employees and representatives of SFCT must practice honesty and integrity in fulfilling their responsibilities, and they must comply with all applicable laws and regulations.

Compliance Officer

SFCT's Compliance Officer is the Treasurer and is responsible for investigating and resolving all reported complaints and allegations concerning violations of the Whistleblower Policy and, at his or her discretion, shall advise the Executive Director and/or the Finance Committee. The Compliance Officer has direct access to the Finance Committee of the Board of Directors and is required to report to the Finance Committee at least annually on compliance activity.

Reporting Responsibility

It is the responsibility of all directors, officers and employees to comply with, and to report violations or suspected violations, in accordance with this Policy.

No Retaliation

No director, officer or employee who in good faith reports a violation of this Policy 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 SFCT prior to seeking resolution outside SFCT.

Reporting Violations

The Policy addresses SFCT's open door policy and suggests that employees share their questions, concerns, suggestions or complaints with someone who can address them properly. In most cases, an employee's supervisor is in the best position to address an area of concern. However, if the employee is not comfortable speaking with his or her supervisor, or is not satisfied with the supervisor's response, the employee is encouraged to speak with the Executive Director, or if it involved the Executive Director, report to the Compliance Officer. Supervisors and managers are required to report suspected violations of this Policy to SFCT's Compliance Officer, who has specific and exclusive responsibility to investigate all reported violations. For suspected fraud, or when one is not satisfied or uncomfortable with following SFCT's open door policy, that individual should contact SFCT's Compliance Officer directly.

Accounting and Auditing Matters

The Finance Committee of the Board of Directors shall address all reported concerns or complaints regarding corporate accounting practices, internal controls or auditing. The Compliance Officer shall immediately notify the Finance Committee of any such complaint and work with the committee until the matter is resolved.

Acting in Good Faith

Anyone filing a complaint concerning a violation or suspected violation of the Whistleblower Policy must be acting in good faith and have reasonable grounds for believing the information disclosed indicates a violation of the Policy. 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.



Secretary



Date