# Sierra Club Foundation Whistleblower Policy

Approved June 23, 2016

Sierra Club Foundation is committed to maintaining the highest standards of conduct and ethical behavior and promotes a working environment that values respect, fairness and integrity. All Directors, employees and volunteers of the Foundation are required to observe high standards of business and personal ethics in the conduct of all of their duties and responsibilities. It is also their responsibility to report suspected fraudulent or dishonest conduct in accordance with the guidelines below.

### I. Reporting of Violations

An employee's concerns about possible fraudulent or dishonest conduct or suspected violations of state and federal laws, including employment laws should be reported to his or her supervisor for further investigation. The Executive Director, Directors and volunteers should report concerns to the Board Chair. If an employee is not comfortable with reporting concerns to his or her supervisor (or is dissatisfied with the supervisor's response), their concerns may be reported to the Executive Director, Board Chair or, in the case of suspected financial misconduct, Chair of the Audit Committee. Alternatively, an anonymous written statement may be submitted to one of the individuals listed above

### II. Investigation

It is the responsibility of all supervisors and Directors to investigate reported violations and to initiate appropriate corrective action in a thorough and timely manner. Reports of suspected violations will be kept confidential to the greatest extent possible, consistent with the need to conduct an adequate investigation. Documentation will be maintained regarding the reporting, investigation and resolution of all suspected violations.

### III. Acting in Good Faith

Anyone filing a complaint regarding possible fraudulent or dishonest conduct must be acting in good faith and have reasonable grounds for believing the information disclosed represents a violation of law or policy. Individuals making allegations which prove to have been made with disregard for their lack of accuracy will be subject to disciplinary action.

### IV. No Retaliation

No Director, employee or volunteer who reports possible fraudulent or dishonest conduct in good faith will suffer harassment, retaliation or adverse employment consequences because the individual makes a good faith complaint about suspected violations of federal or state law, rule or regulation or participates in any investigation of any such alleged violations. Any Director, employee or volunteer who retaliates against someone who has reported a violation in good faith will be subject to disciplinary action.

## V. Dissemination of Policy

The Foundation's Whistleblower policy will be included in both the Employee and Director Handbooks. In addition, a copy will be provided to all new and existing Directors, employees, and volunteers.