

Hudson Community Foundation (HCF) Employee Protection (Whistleblower) Policy

Revised 9/6/11

Policy

HCF is committed to maintaining a workplace where employees are free to raise good faith concerns regarding HCF's business practices, specifically:

- reporting suspected violations of applicable law and regulations on the part of HCF, including but not limited to federal laws and IRS regulations
- providing truthful information in connection with an inquiry or investigation by a court, agency, law enforcement, or other governmental body
- identifying potential violations of HCF's policies.

An employee who wishes to report a suspected violation of law or HCF policy may do so confidentially (in person or anonymously) by contacting the President, the Chairman, a Board Member or HCF's General Counsel.

Concerns may be submitted anonymously. Because it is impossible to seek additional information from a reporting individual about anonymous reports, it is essential that such reports contain as much specific information as possible.

Reporting individuals may submit concerns to the President/CEO or directly to the Chairman of the Executive Committee. If the reporting Individual is not comfortable reporting to either of these individuals or if he/she does not believe the issue is being properly addressed, the volunteer or trustee may report directly to the Chairman of the Board of Directors.

For matters reported to the President/CEO, the President/CEO shall promptly (generally within five business days) acknowledge receipt of the complaint to the complainant if the identity of the complainant is known and conduct an investigation to determine if the allegations are true and whether the issue is material and what, if any, corrective action is necessary. Upon the conclusion of this investigation, the President/CEO shall promptly report its findings to the Executive Committee.

HCF will investigate all reports filed in accordance with this policy with due care and promptness. Matters reported internally without initial resolution will be investigated by the President/CEO to determine if the allegations are true, whether the issue is material and what actions, if any, are necessary to correct the problem. The President/CEO will issue a full report of all matters raised under this policy to the Executive Committee. The Executive Committee may conduct a further investigation upon receiving the report from the President/CEO.

For matters reported directly to the Chairman of the Executive Committee or to the Chairman of the Board, that person shall promptly (generally within five business days) acknowledge receipt of the complaint to the complainant if the identity of the complainant is known and conduct an investigation to determine if the allegations are true and whether the issue is material and what, if any, corrective action is necessary. Upon the conclusion of this investigation, the Executive Committee shall promptly report its findings to the Board of Directors.

The Chairman of the Board, the President/CEO, the Chairman of the Executive Committee shall have full authority to investigate concerns raised in accordance with this policy and may retain outside legal counsel, accountants, private investigators, or any other resource that the Committee reasonably believes is necessary to conduct a full and complete investigation of the allegations.

All relevant matters, including suspected but unproved matters, will be reviewed and analyzed, with documentation of the receipt, retention, investigation and treatment of the complaint. Appropriate corrective action will be taken, if necessary, and findings will be communicated back to the reporting person. Investigations may warrant investigation by an independent person such as HCF's Independent Auditor and/or HCF's General Counsel

The support of all employees is necessary to achieving compliance with various laws and regulations. An employee is protected from retaliation only if the employee brings the alleged unlawful activity, policy, or practice to the attention of HCF and provides the HCF with a reasonable opportunity to investigate and correct the alleged unlawful activity. The protection described below is only available to employees that comply with this requirement.

HCF will not retaliate against an employee who in good faith, has made a protest or raised a complaint against some practice of HCF, or of another individual or entity with whom HCF has a business relationship, on the basis of a reasonable belief that the practice is in violation of law, or a clear mandate of public policy.

HCF will not retaliate against employees who disclose or threaten to disclose to a supervisor or a public body, any activity, policy, or practice of HCF that the employee reasonably believes is in violation of a law, or a rule, or regulation mandated pursuant to law or is in violation of a clear mandate or public policy.

My signature below indicates my receipt and understanding of this policy. I also verify that I have been provided with an opportunity to ask questions about this policy.

Employee Signature Date

For more information or assistance contact the President/CEO.

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