**1. Purpose**

The United Way of South Sarasota County, hereafter known as UWSSC, requires board members, committee members, employees and volunteers to observe high standards of business and personal ethics in the conduct of their duties and responsibilities, and all directors, committee members and employees to comply with all applicable laws and regulatory requirements.

**2. Reporting Responsibility**

UWSSC seeks to have an “Open Door Policy” and encourages board members, committee members, employees and volunteers to share their questions, concerns, suggestions or complaints regarding the UWSSC and its operations with someone who can address them properly. In most cases, a board member, committee member, employee or volunteer should present his or her concerns to the Executive Director and/or the Board President. However, if a board member, committee member, employee or volunteer is not comfortable speaking with the Executive Director and/or the Board President or is not comfortable with the Executive Director’s and/or the Board President’s response, the board member, committee member, employee or volunteer is encouraged to speak with anyone on the Board whom they are comfortable in approaching, or to directly contact the UWSSC’s outside legal counsel, whose contact information can be obtained from the Executive Director.

**3. No Retaliation**

No board member, committee member, employee or volunteer who in good faith reports a violation of a law or regulation requirement 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 persons to raise serious concerns within UWSSC prior to seeking resolution outside UWSSC.

**4. Compliance Officer\***

UWSSC’s President/CEO, working with the Board Chairman, will act as UWSSC’s Compliance Officer. The Compliance Officer is responsible for investigating and resolving all board member, committee member, employee or volunteer complaints and allegations concerning violations of the Principles and/or Code. The Board Chairman or his or her designee will take on the Compliance Officer role if the complaint involves the President/CEO. If the complaint involves both the President/CEO and Board Chairman, outside legal counsel will carry out the functions of the Compliance Officer.

**5. 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.

**6. Acting in Good Faith**

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

**7. 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.

**8. Handling of Reported Violations**

The Compliance Officer, or the person responsible for carrying out the Compliance Officer’s role with respect to a reported or suspected violation, will acknowledge receipt of the reported violation or suspected violation by writing a letter (or e-mail) to the complainant within five business days. All reports will be promptly investigated and appropriate corrective action will be taken if warranted by the investigation.

\*The Compliance Officer may be a board member, the President/CEO, or a third party designated by the UWSSC to receive, investigate and respond to complaints.

ACCEPTED and APPROVED by the Board of Directors of THE UNITED WAY OF SOUTH SARASOTA COUNTY, INC., effective this 20th day of August, 2020.

UNITED WAY OF SOUTH SARASOTA COUNTY, INC.

Barbara Cruz, President/CEO