

Rotary Club of Torrington Winsted Areas  
**Whistleblower Policy**  
March 12, 2015

**Introduction**

The whistleblower policy of the Rotary Club of Torrington Winsted Areas (“Rotary Club”) is intended to provide a mechanism for the reporting of illegal activity or the misuse of Rotary Club assets while protecting the volunteers who make such reports from retaliation. The Rotary Club will investigate any suspected fraudulent or dishonest use or misuse of the Rotary Club resources or property by staff or volunteers.

**Reporting Responsibility**

It is the responsibility of all directors, officers, and members to report violations or suspected violations in accordance with this Whistleblower Policy. Volunteers and consultants are also encouraged to report any violations or suspected violations.

**Questionable Conduct**

This policy is designed to address situations in which a member suspects another member has engaged in illegal acts or questionable conduct involving the Rotary Club assets. This conduct might include outright theft (of equipment or cash), fraudulent expense reports, misstatements of any accounts to any member or to the Rotary Club’s auditors, or even a volunteer’s conflict of interest that results in financial harm to the Rotary Club. The Rotary Club encourages members to report such questionable conduct and has established a system that allows them to do so anonymously.

**No Retaliation**

No director, officer, or member who in good faith reports suspicious conduct shall suffer harassment, retaliation, or adverse employment consequence. An member 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 members and others to raise serious concerns within the organization prior to seeking resolution outside the organization.

**Accounting and Auditing Matters**

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

**Acting in Good Faith**

Anyone filing a complaint concerning a suspicious conduct must be acting in good faith and have reasonable grounds for believing the information disclosed indicates illegal activity or a misuse of Rotary Club assets. 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.

## Reporting Procedures

If a member suspects illegal conduct or conduct involving misuse of the Rotary Club assets or in violation of the law, he or she may report it, anonymously if the member wishes, and will be protected against any form of harassment, intimidation, discrimination, or retaliation for making such a report in good faith.

1. Members can make a report to any of the following Rotary Club Board Officers at any time: President, President Elect, Vice President, Treasurer or Secretary. The Rotary Club will promptly conduct an investigation into matters reported, keeping the informant's identity as confidential as possible consistent with our obligation to conduct a full and fair investigation.
2. The report is promptly reviewed by the President, as well as the Treasurer, to determine whether the report constitutes a complaint or a non-complaint, unless one of them is allegedly involved in the misconduct, in which case the report should be reviewed by only one of them. (If both of them are alleged to be involved, the report should go directly to the President Elect of the Board of Directors.)
  - a. A *complaint* means any report involving (i) questionable accounting, auditing, financial reporting, or internal controls; (ii) suspected fraud, theft, or improper use of company assets; (iii) a violation of the Rotary Club's conflict-of-interest policy that results in a financial harm to the Rotary Club; or (iv) a claim of retaliation against any employee making a good-faith report regarding any of the preceding matters.
  - b. A *non-Complaint* means a report of any other matter not involving a misuse of the Rotary Club's assets.
3. If the report is deemed to be a complaint, it will be promptly investigated and forwarded to the board President. If the report is deemed to be a non-complaint, it will be referred to the appropriate Board Officer for follow-up. Some non-complaints may involve serious matters and may require prompt investigation, but may nevertheless not involve misuse of the Rotary Club's assets.
4. Each complaint is fully investigated, and as far as possible handled so as to protect the privacy of the employee making the complaint. A written report of the outcome of each investigation is prepared and delivered to the audit committee chair.
5. The board President decides whether the report involves a matter that is material. If it is deemed material, it is reviewed by the full committee, which may forward it for disposition to the board or may direct a Board Officer to take actions to resolve the situation. If the report is deemed nonmaterial, it is not reviewed by the committee but is instead addressed by the President, as appropriate.