WHISTLEBLOWER POLICY & PROCEDURE

Policy

The objective of the Coldharbour Institute's Whistleblower Policy is to establish a policy for the protection of directors, volunteers and employees reporting Concerns from retaliation, harassment, or adverse employment consequences related to complaints of organizational wrongdoing.

Procedure

The Coldharbour Institute encourages directors, other volunteers, and employees to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. Employees and representatives of the organization should practice honesty and integrity in fulfilling their responsibilities and comply with all applicable laws and regulations. Detailed are the procedures for reporting violations of (a) questionable or improper accounting or auditing matters, and (b) violations and suspected violations of applicable laws and regulations (herein collectively referred to as Concerns); (c) and for the receipt and retention of complaints received.

Reporting Responsibility

Each director, volunteer, and employee of the Coldharbour Institute has an obligation to report in accordance with this Whistleblower Policy within 90 days of discovering the violation.

Authority of the President and Vice President of the Board of Directors

All reported Concerns will be forwarded to the President and Vice President of the board of directors in accordance with the procedures set forth herein. The President and Vice President of the board of directors shall be responsible for investigating, and making appropriate recommendations to the board of directors, with respect to all reported Concerns.

No Retaliation

This Whistleblower Policy is intended to encourage and enable directors, volunteers, and employees to raise Concerns within the organization for investigation and appropriate action. With this goal in mind, no director, volunteer or employee who, in good faith, reports a Concern shall be subject to retaliation or, in the case of an employee, adverse employment consequences related to whistleblower complaints. Moreover, a volunteer or employee who retaliates against someone who has reported a Concern in good faith is subject to discipline up to and including dismissal from the volunteer position or termination of employment.

Reporting Concerns

Employees should share their Concerns with someone who can address them properly. In most cases their supervisor is in the best position to address a Concern. However, if the employee is not comfortable speaking with the supervisor about the Concern, the employee is encouraged to speak with an officer of the board of directors or anyone in management with whom they are comfortable in approaching. Supervisors and managers are required to report suspected Concerns to the Coldharbour Institute's President and Vice President of the board of directors. For suspected fraud, or when employees are not satisfied or are uncomfortable with following the open door policy, employees should contact the President of the board of directors directly. Directors and other volunteers should submit Concerns in writing directly to the President and Vice President of the board of directors. Contact information for the President and Vice President of the board of directors may be obtained from any board of directors member.

Handling of Reported Violations

The President and Vice President of the board of directors shall address all reported Concerns. The President and Vice President of the board of directors shall notify the committee and the head of any such report within three business days. The President and Vice President of the board of directors will notify the sender and acknowledge receipt of the Concern within five business days, if possible. It will not be possible to acknowledge receipt of anonymously submitted Concerns. All reports will be investigated by the President and Vice President of the board of directors, and appropriate corrective action will be recommended to the board of directors, if warranted by the investigation. In addition, action taken must include a conclusion and/or follow-up with the complainant for complete closure of the Concern. The President and Vice President of the board of directors has the authority to retain outside legal counsel, accountants, private investigators, or any other resource deemed necessary to conduct a full and complete investigation of the allegations.

Acting in Good Faith

Anyone reporting a Concern must act in good faith and have reasonable grounds for believing the information reported indicates a violation of the law, or constitutes an inappropriate accounting or financial practice. The act of making allegations that prove to be unsubstantiated, and that prove to have been made maliciously, recklessly, or with the foreknowledge that the allegations are false, will be viewed as a serious disciplinary offence and may result in discipline, up to and including dismissal from the volunteer position or termination of employment. Such conduct may also give rise to other actions, including civil lawsuits.

Confidentiality

Reports on Concerns, and investigations pertaining thereto, shall be kept confidential to the extent practical, consistent with the need to conduct an adequate investigation. Disclosure of reports of Concerns to individuals not involved in the investigation will be viewed as a serious disciplinary offense and may result in discipline, up to and including dismissal from the volunteer position or termination of employment. Such conduct may also give rise to other actions, including civil lawsuits.

Statement of Understanding

I have read and understand the Coldharbour Institute's whistleblower policy.

Name: _____

Signed: _____

Date: _____