

21 & Change, Inc.

“WHISTLEBLOWER” POLICY

AS OF: 8 SEPTEMBER 2018

Preamble

21 & Change, Inc. [hereafter referred to as “corporation”] requires directors, officers, employees and volunteers to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. As employees and representatives of the corporation, we must practice honesty and integrity in fulfilling our responsibilities and comply with all applicable federal, state and local laws and regulations.

Under Florida State law, an employer may not take retaliatory personnel action against an employee because the employee has disclosed or threatened to disclose to a government agency an activity, policy or practice that is in violation of a law; or testified before an entity conducting an investigation into possible violations; or refused to participate in an activity, policy or practice that is in violation of a law, rule or regulation. Public employees cannot be discharged, disciplined, or subjected to adverse personnel action for making disclosures involving a violation of state or federal law that creates a substantial and specific danger to the public’s health, safety or welfare.

Reporting Responsibility

This Whistleblower Policy is intended to encourage and enable employees and others to raise serious concerns internally so that the corporation can address and correct inappropriate conduct and actions. It is the responsibility of all board members, officers, employees and volunteers to report concerns about violations of the corporation’s code of ethics or suspected violations of law or regulations that govern the corporation’s operations.

No Retaliation

It is contrary to the values of the corporation for anyone to retaliate against any board member, officer, employee or volunteer who in good faith reports an ethics violation, or a suspected violation of law, such as a complaint of discrimination, or suspected fraud, or suspected violation of any regulation governing the operations of the corporation. 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.

Reporting Procedure

The corporation has an “open door” policy and suggests that employees share their questions, concerns, suggestions or complaints with their supervisor. If you are not comfortable speaking with your supervisor or you are not satisfied with your supervisor’s response, you are encouraged to speak with any member of the Board of Directors with whom you feel comfortable. Supervisors and managers are required to report complaints or concerns about suspected ethical and legal violations in writing to the corporation’s President, who has the responsibility to investigate all reported complaints.

President

The corporation's President is responsible for ensuring that all complaints about unethical or illegal conduct are investigated and resolved. The President will advise the Board of Directors of all complaints and their resolution and will report at least annually to the Board on compliance activity relating to accounting or alleged financial improprieties.

Accounting and Auditing Matters

The corporation's President shall immediately notify the Board of Directors of any concerns or complaint regarding corporate accounting practices, internal controls or auditing and work with the Board until the matter is resolved.

Acting in Good Faith

Anyone filing a written complaint concerning a violation or suspected violation 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.

Confidentiality

Violations, or suspected violations may be submitted on a confidential basis by the complainant. Reports of violations or suspected violations will be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation.

Handling of Reported Violations

The corporation's President will notify the person who submitted a complaint and acknowledge receipt of the reported violation or suspected violation. All reports will be promptly investigated, and appropriate corrective action will be taken if warranted by the investigation.

Policy Update

This policy will be updated or rewritten as required, but no less than every two years.

Point of contact for this policy is John Bodor
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Policy approved by the Board of Directors on 8 September 2018.