



The Independence Center Whistleblower Protection Policy

Issue Date: Policy approved by the Board of Directors on September 18, 2013

The Independence Center (THE IC) requires board and committee members, volunteers and employees to observe high standards of business and personal ethics in conducting their duties and responsibilities. As employees and representatives of THE IC, we must practice honesty and integrity in fulfilling our responsibilities and comply with all applicable laws and regulations.

Reporting Responsibility

THE IC's Whistleblower Protection Policy is intended to encourage and enable employees and others to raise serious concerns internally so that The IC can address and correct inappropriate conduct or actions. It is the responsibility of all board and committee members, volunteers and employees to report concerns about violations of THE IC's ethical standards or suspected violations of law or regulations that govern THE IC's operations.

No Retaliation

It is contrary to the values of THE IC for anyone to retaliate against any board member, committee member, volunteer or employee who in good faith reports an ethics violation, or a suspected violation of law, such as suspected fraud, or suspected violation of any regulation governing the operations of THE IC. An employee who retaliates against someone who has reported a violation in good faith is subject to discipline up to and including termination.

Reporting Procedure

THE IC 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 or submitting your concerns in writing to your supervisor, or you are not satisfied with your supervisor's response, you are encouraged to speak with your director, the Director of Human Resources, or the CEO. Supervisors and managers are required to report complaints or concerns about suspected ethical or legal violations in writing to the IC's Compliance Officer who will investigate all reported claims.

Compliance Officer

The IC’s Compliance Officer is responsible for ensuring that all complaints about unethical or illegal conduct are investigated and resolved. The Compliance Officer will advise the CEO and/or the Board of Directors of all complaints and their resolution.

Accounting and Auditing Matters

The IC’s Compliance Officer shall immediately notify the CEO and/or the Finance Committee of the Board of Directors of any concerns or complaints regarding accounting practices, internal controls or auditing until the matter is resolved.

Acting in Good Faith

Anyone filing a written complaint concerning a violation or suspected violation must be acting on a reasonable good faith belief that a violation has occurred. If the IC’s Compliance Officer determines that a complaint was made maliciously or without a reasonable, good faith belief in its validity, it will be viewed as a serious disciplinary offense.

Confidentiality

Reports or 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 IC’s Compliance Officer 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 taken if warranted by the investigation.

Compliance Officer:
Jennifer Butcher
Director of Human Resources
719.471.8181 ext. 148
jbutcher@the-ic.org

I have read and understand THE IC’s Whistleblower Protection Policy

Name	Signature	Date