

WHISTLEBLOWER & REPORTING MISCONDUCT POLICY



Free the Slaves requires its staff and volunteers to make good faith reports of the suspected misconduct by the organization or any employee or agent. Such reports should be brought to the attention of the CEO, COO or Board Chair, who have an affirmative duty to investigate such reports and bring the results of the investigation to the Board of Directors. The commitment to improve the quality of the organization through such reports is vital to the wellbeing of the entire community. Retaliation as a response to such reports will not be tolerated.

Retaliation, whether actual or threatened, destroys a sense of community and trust that is central to a quality environment. Free the Slaves, therefore, wishes to make clear that it considers acts or threats of retaliation in response to such reports to constitute a serious violation of the organization's policy.

For purposes of this policy, "misconduct" means a violation that is not merely the employee's wish to substitute his or her judgment for the business judgment of FTS, but rather is an activity, practice or policy that the employee reasonably believes is in violation of a federal or state statute or regulation, is fraudulent or criminal or is incompatible with public policy concerning matters such as public health, safety or welfare or the preservation of the environment.

"Good faith report" means a report of misconduct, which the person making the report has a reasonable belief to be true and which is made without malice or consideration of personal benefit. Employees may submit reports anonymously, if they so choose. FTS will treat such reports as confidential, to the extent possible. However, FTS may need to disclose certain information in connection with the investigation and corrective actions taken.

No employee or affiliate shall engage in retaliation in response to a good faith report. Actions are considered retaliatory if they are in response to a good faith report and have a materially adverse effect on the working conditions of the employee making the good faith report. For example, retaliatory actions include making any decision adverse to the employee solely as a result of that employee's good faith report or subjecting the employee to harassment such that it creates a hostile work or learning environment.

Free the Slaves will make every reasonable effort to stop retaliation immediately, to conduct a complete and thorough investigation of alleged acts of retaliation in a timely manner, to provide remedies to victims of retaliation, and to sanction the perpetrators of retaliation as appropriate.

To encourage and protect employees who make good faith reports of misconduct, it is the organization's policy that no reference to good faith reports shall be made in personnel files, letters of recommendation, performance appraisals, or any other permanent evaluative documents without the approval of the employee.

Reports of alleged misconduct that are not made in good faith are not protected under this policy. Those who make reports not in good faith will be disciplined as appropriate. It is not retaliation to discipline persons who knowingly or intentionally make false claims of misconduct or for the organization to take affirmative steps to prevent or correct damage to persons when it is determined that allegations of misconduct against them are false.