



Post Office Box 252  
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## **WHISTLEBLOWER PROTECTION**

In keeping with the policy of maintaining the highest standards of conduct and ethics, Warrior Wishes Montana, Inc. will investigate any suspected fraudulent or dishonest use or misuse of Warrior Wishes Montana, Inc. resources or property by staff, board members, consultants, or volunteers.

### **Reporting**

A person's concerns about possible fraudulent or dishonest use or misuse of resources or property should be reported to the Board of Directors, if suspected by a volunteer, to the Board member supporting the volunteer's work. If, for any reason, a person finds it difficult to report his or her concerns to the Board member supporting the volunteer's work, the person may report the concerns directly to another Board member. Alternately, to facilitate reporting of suspected violations where the reporter wishes to remain anonymous, a written statement may be submitted to the Board of Directors.

### **Definitions**

#### ***Baseless Allegations***

Allegations made with reckless disregard for their truth or falsity. Individuals making such allegations may be subject to disciplinary action by the Board of Directors and/or legal claims by individuals accused of such conduct.

#### ***Fraudulent or Dishonest Conduct***

A deliberate act or failure to act with the intention of obtaining an unauthorized benefit.

Example of such conduct include

- Forgery or alteration of documents
- Unauthorized alteration or manipulation of computer files
- Fraudulent financial reporting
- Pursuit of a benefit or advantage in violation of Warrior Wishes Montana, Inc.' Conflict of Interest Policy
- Misappropriation or misuse of Warrior Wishes Montana, Inc. resources, such as funds, supplies, or other assets
- Authorizing or receiving compensation for goods not received or services not performed
- Authorizing or receiving compensation for hours not worked.

### ***Whistleblower***

A member, consultant, or volunteer who informs a supervisor or the Board of Directors about an activity relating to Warrior Wishes Montana, Inc. which that person believes to be fraudulent or dishonest.

### ***Investigation***

All relevant matters, including suspected but unproved matters, will be reviewed and analyzed, with documentation of the receipt, retention, investigation, and treatment of the complaint.

Appropriate corrective action will be taken, if necessary, and findings will be communicated to the reporting person. Investigations may warrant investigation by independent persons such as auditors and/or attorneys.

### ***Whistleblower Protection***

Warrior Wishes Montana, Inc. will protect whistleblowers as defined below:

- Warrior Wishes Montana, Inc. will use its best efforts to protect whistleblowers against retaliation. Whistleblowing complaints will be handled with sensitivity, discretion, and confidentiality to the extent allowed by the circumstances and the law. Generally, this means that whistleblower complaints will only be shared with those who have a need to know so that Warrior Wishes Montana, Inc. can conduct an effective investigation, determine what action to take based on the results of any such investigation, and in appropriate cases, with law enforcement personnel (Should disciplinary or legal action be taken against a person or persons as a result of a whistleblower complaint, such persons may also have the right to know the identity of the whistleblower).
- Members, consultants, and volunteers of Warrior Wishes Montana, Inc. may not retaliate against a whistleblower for informing the Board of Directors about an activity which that person believes to be fraudulent or dishonest with the intent or effect of adversely affecting the whistleblower's membership. Any retaliation will be promptly investigated and appropriate corrective measures taken if allegations or retaliation are substantiated. This protection from retaliation is not intended to prohibit members from taking action, including disciplinary action, in the usual scope of their duties and based on valid performance-related factors.
- Whistleblowers must be cautious to avoid baseless allegations (as described earlier in the definitions section of this policy).