**Whistleblower Protection Policy**

**-Draft-**

West Michigan Trails & Greenways Coalition (WMTGC) requires directors, officers, and employees, contracted 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 WMTGC, we must practice honesty and integrity in fulfilling our responsibilities and comply with all applicable laws and regulations.

**Reporting Responsibility**

This Whistleblower Policy is intended to encourage and enable employees and others to raise serious concerns, internally, so that WMTGC 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 WMTGC’s code of ethics or suspected violations of law or regulations that govern WMTGC’s operations.

**No Retaliation**

It is contrary to the values of WMTGC for anyone to retaliate against any board member, committee member, 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 WMTGC. 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**

WMTGC has an open-door policy and suggests that employees share their questions, concerns, suggestions, or complaints with their supervisor or any member of the Executive Board of WMTGC. WMTGC has the responsibility to investigate all reported complaints.

**Resolution of Complaints**

All members of the WMTGC Board are responsible for ensuring that all complaints about unethical or illegal conduct are investigated and resolved if an issue is brought to them. Any Board member shall advise the Executive Director and Executive Board of all complaints and their resolution and will report at least annually to the Finance Committee on compliance activity relating to accounting or alleged financial improprieties.

**Accounting and Auditing Matters**

The WMTGC Board Members shall immediately notify the Finance Committee of any concerns or complaints regarding corporate accounting practices, internal controls, or auditing, and work with the committee 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.