

Milwaukee LGBT Community Center

Whistleblower Protection Policy

(Approved by the Board of Directors on November 19, 2008)

I. INTRODUCTION

A. Both the Common Code of Ethics and the Philanthropy Code of Ethics adopted by the Milwaukee LGBT Community Center (herein referred to as the “Center”) requires all staff and volunteers as well as the Board of Directors to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. As employees and representatives of the Center, we must practice honesty and integrity in fulfilling our responsibilities and comply with all applicable laws and regulations. Set forth below is the Center’s policy with respect to reporting good-faith concerns about the legality or propriety of Center actions or plans.

II. REPORTING OF CONCERNS OR COMPLAINTS

A. It is the responsibility of all staff and volunteers as well as the Board of Directors to comply with the two Codes of Ethics approved by the Center’s Board of Directors and with applicable laws and to report violations or suspected violations in accordance with this Whistleblower Protection Policy.

III. CONFIDENTIALITY

A. The Center will treat all communications under this policy in a confidential manner, except to the extent necessary:

1. To conduct a complete and fair investigation, or
2. For review of Center operations by its Board of Directors, audit committee, independent public accountants, and legal counsel.

IV. RETALIATION

A. The Center will not permit any negative or adverse actions to be taken against any employee or individual for making a good-faith report of a possible violation of its Codes of Ethics or applicable laws, even if the report is mistaken, or against any employee or individual who assists in the investigation of a reported violation.

B. Retaliation in any form will not be tolerated. Any act of alleged retaliation should be reported immediately and will be promptly investigated.

C. 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.

D. This Whistleblower Protection Policy is intended to encourage and enable employees and others to raise serious concerns within the Center prior to seeking resolution outside the organization.

V. HOW TO REPORT CONCERNS OR COMPLAINTS

A. Employees and others may communicate suspected violations of its Codes of Ethics, applicable laws, or other wrongdoing or alleged retaliation by contacting the Compliance Officer.

- B. To retain anonymity, it is not necessary to provide your name or position in any notification.
- C. Whether or not you identify yourself, for a proper investigation to be conducted, please provide the Center with as much information as you can, sufficient to do a proper investigation, including where and when the incident occurred, names and titles of the individuals involved, and as much other detail as you can provide.

VI. ILLUSTRATIVE TYPES OF CONCERNS

- A. The following is a non-exhaustive list of the kinds of improprieties that should be reported:
 - 1. Supplying false or misleading information on the Center's financial or other public documents, including its Form 990.
 - 2. Providing false information to or withholding material information from the Board of Directors or the Center's auditors.
 - 3. Destroying, altering, mutilating, concealing, covering up, falsifying, or making a false entry in any records that may be connected to an official proceeding, in violation of federal or state law or regulations.
 - 4. Altering, destroying, or concealing a document, or attempting to do so, with the intent to impair the document's availability for use in an official proceeding or otherwise obstructing, influencing, or impeding any official proceeding, in violation of federal or state law or regulations.
 - 5. Embezzling, self-dealing, private inurement (i.e., Center earnings inuring to the benefit of a Board member or senior management) and private benefit (i.e., Center assets being used by anyone in the organization for personal gain or benefit).
 - 6. Paying for services or goods that are not rendered or delivered.
 - 7. Using remarks or actions of a sexual nature that are not welcome and are likely to be viewed as personally offensive, including sexual flirtations; unwelcome physical or verbal advances; sexual propositions; verbal abuse of a sexual nature; the display of sexually suggestive objects, cartoons, or pictures; and physical contact of a sexual or particularly personal nature.
 - 8. Using epithets, slurs, negative stereotyping, and threatening, intimidating, or hostile acts that relate to race, color, religion, gender, sexual orientation, gender identity and expression, national or ethnic origin, age, or disability.
 - 9. Circulating or posting written or graphic material in the workplace that denigrates or shows hostility or aversion toward an individual or group because of race, color, religion, gender, sexual orientation, gender identity and expression, nationality, ethnicity, age, or disability.
 - 10. Discriminating against an employee or potential employee due to a person's race, color, religion, sex, sexual orientation, gender identity and expression, national or ethnic origin, age, physical or mental impairment, or veteran status.

11. Violating the Center's Common Code of Ethics, Philanthropy Code of Ethics, Conflict-of-Interest Policy, Harassment Policy, or Equal Employment Opportunity Policy.

12. Facilitating or concealing any of the above or similar actions.

VII. QUESTIONS

- A. If you have any questions regarding this policy, please feel free to contact Patrick Price, the Compliance Officer of the Milwaukee LGBT Community Center.
- B. If you question or have a concern about the actions of the Compliance Officer, please contact the Executive Director immediately.
- C. If you question or have a concern about the actions of both the Compliance Officer *and* the Executive Director, please contact one of the Co-Presidents of the Board of Directors.

Signature _____ Date _____

Name (please print) _____