



## - Know Agenda Foundation -

Public Service Management: Fiscal Sponsorship | Program Incubation | Grant & Donor Facilitation

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### Whistleblower Policy

#### General

Know Agenda Foundation (KAF) holds its staff, board directors, contractors and volunteers to high standards of ethics and conduct and in adopting this policy, requires staff, board directors, contractors and volunteers to maintain these standards of business and personal ethics in the conduct of their duties and responsibilities. As representatives of KAF, staff, board directors, contractors and volunteers must practice honesty and integrity in all dealings in which they represent Know Agenda Foundation, and Know Agenda Foundation's Sponsored Projects. Failure to follow these standards may result in disciplinary action including possible termination of employment or contract, dismissal from one's board duties and possible civil or criminal prosecution, if warranted.

Staff, board members, consultants and volunteers are encouraged to report suspected fraudulent or dishonest conduct (i.e. to act as "whistleblower"), in accordance with this policy.

#### Reporting

A person's concerns about possible fraudulent or dishonest use or misuse of resources or property should be reported to the Managing Director or the Board Chair. KAF supports an open-door policy and suggests that staff, directors, contractors, volunteers and other interested parties share their questions, concerns, suggestions or complaints with a key Administrator who is able to address them properly. If a person finds it difficult to report these concerns to the Managing Director or another staff member, s/he may report these concerns directly to the Board Chair.

For violations related to the protection of child and youth protection, please also refer to the *Professional Conduct Between Adults and Youth Policy* for additional guidance. For violations related to harassment, please also refer to the *Harassment Prevention and Protection Policy* for additional guidance. For violations related to the elderly or dependent persons, please also refer to the *Elderly or Dependent Adult Reporting Policy* for additional guidance.

#### Handling of Reported Violations

Staff members, board directors, contractors and volunteers should immediately inform the Managing Director of any reported violations. If the violation concerns the Managing Director, staff members, board directors, contractors and volunteers should then inform the Board Chair. The Managing Director (or Board Chair) will notify the sender and acknowledge receipt of the reported violation or suspected violation within five business days. All reports will be promptly investigated and appropriate corrective action will be taken if warranted by the investigation.

### **No Retaliation**

No staff member, director, officer or employee who in good faith reports a violation shall suffer harassment, retaliation or adverse employment consequences. Staff members, board directors, contractors and volunteers of KAF may not retaliate against a whistleblower for informing management about an activity which that person believes to be fraudulent or dishonest with the intent or effect of adversely affecting the terms or conditions of the whistleblower's employment, including but not limited to, threats of physical harm, loss of job, punitive work assignments, or impact on salary. A staff member, board director, contractor or volunteer who retaliates against someone who has reported a violation in good faith is subject to discipline up to and including termination of employment or removal, as the case may be. This policy is intended to encourage and enable stakeholders to promptly raise serious concerns to Know Agenda Foundation.

### **Acting in Good Faith**

Anyone filing a complaint concerning a violation or suspected violation must act in good faith and have reasonable grounds for believing the information disclosed is a violation. Any baseless allegations that prove to be unsubstantiated and which prove to have been made maliciously or knowingly to be false shall be viewed as a serious disciplinary offense.

### **Confidentiality**

Violations or suspected violations may be submitted on a confidential basis by the complainant. Whistle-blowing 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 individuals to whom it is necessary to disclose the complaints in order for KAF to conduct an effective investigation and determine what action to take based on the results of any such investigation. In appropriate cases, the complaints may be shared 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 shall also have the right to know the identity of the whistleblower.

Violations (or suspected violations) may be submitted on a confidential basis by the complainant or may be submitted anonymously directly to:

General Counsel  
Know Agenda Foundation  
P.O. Box 56341  
Portland, Oregon 97238

### **Accounting and Auditing Matters**

All concerns or complaints regarding corporate accounting practices, internal controls or auditing should be reported to the Managing Director. The Managing Director shall immediately notify the Board Chair of any such complaint and work with the Board Chair (and/or Selected Committee convened to address the issue) until the matter is resolved. If the complaint involves the Managing Director, the violation should be reported to the Board Chair. This reporting procedure differs from that specified under "Reporting."

## Definitions

Whistleblower: An employee, board member, or consultant who informs the Chief Financial and Administrative Officer, President, Board Chair, Chair of the Finance Committee, or Chair of the Audit Committee about an activity relating to the Know Agenda Foundation which that person believes to be fraudulent or dishonest.

Baseless Allegations: Allegations made with reckless disregard for their truth or falsity. Individuals making such allegations may be subject to disciplinary action by the Foundation.

Fraudulent or Dishonest Conduct: A deliberate act or failure to act with the intention of obtaining an unauthorized benefit. Examples of such conduct include, but are not limited to:

- Forgery or alteration of documents;
- Unauthorized alteration or manipulation of computer files;
- Fraudulent financial reporting;
- Pursuit of a benefit or advantage in violation of KAF's Conflict of Interest Policy, Personnel Policies, or Board Policies and Procedures;
- Misappropriation or misuse of the Foundation's resources such as cash, investments, or other assets;
- Authorizing or receiving compensation for goods not received or services not performed;
- Authorizing or receiving compensation for hours not worked; and
- Covering up the fraudulent activity to prevent the discovery of such acts committed stated above.