



# PROSPERITY DENVER FUND

## WHISTLEBLOWER POLICY

### **Policy**

The objective of the Prosperity Denver Fund's Whistleblower Policy is to establish a policy for the protection of directors, volunteers, and employees reporting Concerns from retaliation, harassment, or adverse employment consequences related to complaints of organizational wrongdoing.

### **Procedure**

The Prosperity Denver Fund encourages directors, other volunteers, and employees to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. Employees and representatives of the organization should practice honesty and integrity in fulfilling their responsibilities and comply with all applicable laws and regulations. Detailed are the procedures for reporting violations of (a) questionable or improper accounting or auditing matters; (b) violations and suspected violations of applicable laws and regulations (herein collectively referred to as Concerns); and (c) for the receipt and retention of complaints received.

### **Reporting Responsibility**

Each director, volunteer, and employee of the Prosperity Denver Fund has an obligation to report in accordance with this Whistleblower Policy within 90 days of discovering the violation.

### **No Retaliation**

This Whistleblower Policy is intended to encourage and enable directors, volunteers, and employees to raise Concerns within the organization for investigation and appropriate action. With this goal in mind, no director, volunteer or employee who, in good faith, reports a Concern shall be subject to retaliation or, in the case of an employee, adverse employment consequences related to whistleblower complaints. Moreover, a volunteer or employee who retaliates against someone who has reported a Concern in good faith is subject to discipline up to and including dismissal from the volunteer position or termination of employment.

### **Reporting Concerns**

Employees should share their Concerns with someone who can address them properly. In most cases their supervisor is in the best position to address a Concern. However, if the employee is not comfortable speaking with the supervisor about the Concern, the employee is encouraged to speak with any officer with whom they are comfortable in approaching. Supervisors and managers are required to report suspected Concerns to the

Prosperity Denver Fund's Chief Executive Officer. For suspected fraud, or when employees are not satisfied or are uncomfortable with approaching a supervisor, employees should contact the Chief Executive Officer directly. Directors and other volunteers should submit Concerns in writing directly to the Chief Executive Officer. Concerns related to the performance by the Chief Executive Officer should be reported to the treasurer or a disinterested member of the Board of Directors. In such a case, all references below to "Chief Executive Officer" are deemed replaced with the person to whom the report of a Concern is made.

### **Handling of Reported Violations**

The Chief Executive Officer shall address all reported Concerns and shall notify all other executive officers of any such report within three business days of concluding an investigation. The Chief Executive Officer will notify the sender and acknowledge receipt of the Concern within five business days, if possible. It will not be possible to acknowledge receipt of anonymously submitted Concerns, and such complaints may be difficult to fully investigate and resolve. All reports will be investigated by the Chief Executive Officer or the Organization's legal counsel at the direction of the Chief Executive Officer, and appropriate corrective action will be recommended to the Board of Directors, if warranted by the investigation. In addition, action taken must include a conclusion and/or follow-up with the complainant for complete closure of the Concern. The Chief Executive Officer has the authority to retain outside legal counsel, accountants, private investigators, or any other resource deemed necessary to conduct a full and complete investigation of the allegations.

### **Acting in Good Faith**

Anyone reporting a Concern must act in good faith and have reasonable grounds for believing the information reported indicates a violation of the law, or constitutes an inappropriate accounting or financial practice. The act of making allegations that prove to be unsubstantiated, and that prove to have been made maliciously, recklessly, or with the foreknowledge that the allegations are false, will be viewed as a serious disciplinary offense and may result in discipline, up to and including dismissal from the volunteer position or termination of employment. Such conduct may also give rise to other actions, including civil lawsuits.

### **Confidentiality**

Reports on Concerns, and investigations pertaining thereto, shall be kept confidential to the extent practical, consistent with the need to conduct an adequate investigation. Disclosure of reports of Concerns to individuals not involved in the investigation will be viewed as a serious disciplinary offense and may result in discipline, up to and including

dismissal from the volunteer position or termination of employment. Such conduct may also give rise to other actions, including civil lawsuits.

**Statement of Understanding**

I have read and understand the Denver College Success Corporation's Whistleblower Policy.

Name: \_\_\_\_\_

Signed: \_\_\_\_\_

Date: \_\_\_\_\_