

WHISTLE BLOWING POLICY

POLICY: The YMCA of Greater Hartford suggests that each employee or volunteer share their concerns or complaints regarding any company practices which are or may appear to be:

- Dishonesty and lacking integrity
- Contrary to internal company policies
- Causing inadequate safety concerns
- In violation of any applicable law or regulation

They should be reported to an immediate supervisor or the YMCA of Greater Hartford 24 hour “Ethics Hotline”. Each employee or volunteer of the YMCA of Greater Hartford shall **not** be subject to any disciplinary action due their good faith report of any company practice stated earlier. No employee or volunteer of the YMCA of Greater Hartford shall suffer harassment, retaliation, or adverse employment consequences due to a good faith report of company practice noted earlier.

1.0 RESPONSIBILITY

- 1.1 All employees and volunteers of the YMCA of Greater Hartford are to comply with this policy and to report violations or suspected violations in accordance to this policy.
- 1.2 It is the responsibility of the Staff Values Committee or the HR Committee to address all reported concerns or complaints regarding company accounting practices, policies, and internal controls.
- 1.3 It is the responsibility of the YMCA of Greater Hartford Staff Values Committee to present to the HR committee of any such complaint and resolution.

2.0 ETHICS HOTLINE PROCEDURES

- 2.1 Any violations or complaints reported directly to an immediate supervisor shall be handled according to procedures stated in the YMCA of Greater Hartford Employee Handbook.
- 2.2 Violations reported to the Ethics Hotline shall be routed to the Staff Values Committee and the President. The HR Committee shall personally investigate allegations reported concerning any allegations regarding the senior management. All other reported allegations will be reviewed by the Staff Values Committee comprised of the VP of Human Resources, VP of Finance, and the COO.

- 2.3 The Staff Values Committee must correspond with each other regarding allegations within 4 business days of receiving allegation. This committee will begin to investigate allegations within 48 hours of their initial correspondence.
- 2.4 The Staff Values Committee shall be responsible for preparing a quarterly report of all reported incidents for presentation to the HR and Audit Committee.