



Invest in Baltimore

B C F
BALTIMORE
COMMUNITY
FOUNDATION

Accountability

Whistleblower Policy

rev 09/21/12 1/2

General

Baltimore Community Foundation (Foundation) Code of Ethics and Conduct, as defined within the Foundation's Employee Handbook ("Code"), requires trustees, officers, consultants, volunteers and employees to observe the highest standards of business and personal ethics in the conduct of their duties and responsibilities. As employees and representatives of the Foundation, we must practice honesty and integrity in fulfilling our responsibilities and comply with all applicable laws and regulations.

Reporting Responsibility

It is the responsibility of all trustees, officers, consultants, volunteers and employees to comply with the Code and to report violations or suspected violations in accordance with this Whistleblower Policy.

No Retaliation

No trustee, officer, consultant, volunteer or employee who in good faith reports a violation of the Code shall suffer harassment, retaliation or adverse employment consequence. A trustee, officer or employee who retaliates against someone who has reported a violation in good faith is subject to discipline up to and including termination of employment or, in the case of a trustee, termination as a trustee. This Whistleblower Policy is

intended to encourage and enable employees and others to raise serious concerns within the Foundation prior to seeking resolution outside the Foundation.

Reporting Violations

For Employees:

The Code addresses the Foundation's open door policy and suggests that employees share their questions, concerns, suggestions or complaints with someone who can address them properly. In most cases, an employee's supervisor is in the best position to address an area of concern. However, if you are not comfortable speaking with your supervisor or you are not satisfied with your supervisor's response, you are encouraged to speak with the President of the Foundation. The President of the Foundation will then conduct a formal review and take appropriate action. If the employee is not satisfied with the outcome, he or she may request that the case be taken to the Foundation's Executive Committee. In the event that the violation or suspected violation involves the President, the employee may speak with the Chair of the Foundation's Board of Trustees who will report to the Foundation's Executive Committee.

Any employee may also report any concern about the financial or accounting policies or practices of the Foundation to the Chair of the Foundation's Audit Committee who will report to the Foundation's Executive Committee.



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For Trustees, Officers, Consultants and Volunteers:

Trustees, officers, consultants and volunteers may report any concern to the Chair of the Foundation’s Board of Trustees directly.

Acting in Good Faith

Anyone filing a complaint concerning a violation or suspected violation of the Code must be acting in good faith and have reasonable grounds for believing the information disclosed indicates a violation of the Code. It is a serious disciplinary offense for anyone to make an allegation that cannot be substantiated and that is made maliciously or made with knowledge that it is false.

Confidentiality

Violations or suspected violations may be submitted on a confidential basis by the complainant or may be submitted anonymously. Reports of violations or suspected violations will be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation.

Handling of Reported Violations

If the President, Chair of the Foundation’s Board of Trustees or Chair of the Foundation’s Audit Committee receives notice of any reported violations or suspected violations, he/she will notify the sender and acknowledge receipt of the notice within five business days. If the

President receives notice of a reported violation or suspected violation, he/she will conduct a formal review and take appropriate action. If the Chair of the Foundation’s Board of Trustees or the Chair of the Foundation’s Audit Committee receives notice of a reported violation or suspected violation, he/she will deliver the case to the Foundation’s Executive Committee for investigation. Any such investigation will be conducted by the Foundation’s Executive Committee in conjunction with the Foundation’s legal counsel. All reports will be promptly investigated, and appropriate corrective action will be taken if warranted by the investigation.

Then President, Chair of the Foundation’s Board of Trustees or the Chair of the Foundation’s Audit Committee will communicate quarterly to the Board of Trustees concerning any reported and suspected violations.

Baltimore Community Foundation reporting channel:
Thomas E. Wilcox, *President and Chief Executive Officer*
Raymond L. Bank, *Chair of Foundation’s Board of Trustees*
Richard W. Cass, *Chair of the Foundation’s Audit Committee*

Approved on July 19, 2011