

## POLICY 21

### Whistleblower Policy

21.1 Dwelling Place requires board members, officers, employees, and volunteers to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. As employees and representatives of the Dwelling Place, all must practice honesty and integrity in fulfilling responsibilities and comply with all applicable laws and regulations.

21.2 This Whistleblower Policy is intended to encourage and enable board members, officers, employees, and volunteers to raise serious concerns internally so that Dwelling Place can address and correct inappropriate conduct and actions. It is the responsibility of all the above-mentioned parties to report concerns about violations of Dwelling Place's Code of Ethics or suspected violations of law or regulations that govern Dwelling Place's operations.

21.3 It is contrary to the values of Dwelling Place for anyone to retaliate against any board member, officer, employee, or volunteer who in good faith reports an ethics violation, or a suspected violation of law, such as a complaint of discrimination, or suspected fraud, or suspected violation of any regulation governing the operations of Dwelling Place. 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.

21.4 Dwelling Place has an open door policy and suggests that employees share their questions, concerns, suggestions, or complaints with their supervisor. If an employee is not comfortable speaking with his/her supervisor or is not satisfied with the supervisor's response, the employee is encouraged to speak with the Compliance Officer at Dwelling Place. The designated Compliance Officer at Dwelling Place is the Chief Executive Officer. Supervisors and managers are required to report complaints or concerns about suspected ethical and legal violations in writing to the Dwelling Place Compliance Officer, who has the responsibility to investigate all reported complaints. Employees with concerns or complaints who feel uncomfortable reporting an incident to the Dwelling Place Compliance Officer are allowed to submit their concerns in writing directly to the Chairperson of the Dwelling Place Board.

21.5 The Compliance Officer is responsible for ensuring that all complaints about unethical or illegal conduct are investigated and resolved. The Compliance Officer will report at least annually to the Chairs of the Executive and Finance Committee on compliance activity.

21.6 The Compliance Officer shall immediately notify the Chair of the Executive Committee of all written complaints, and include the Chair of the Finance Committee when there are concerns or complaints regarding corporate accounting, internal control or auditing practices. The Compliance Officer will work with the committees until the matters are resolved.

21.7 Anyone filing a written complaint concerning a violation or suspected violation must be acting in good faith and have reasonable grounds for believing the information disclosed indicates a violation. Any allegations that prove not to be substantiated and which prove to have been made maliciously or knowingly to be false will be viewed as a serious disciplinary offense.

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