



## Whistle-Blower Policy

### Purpose

The purpose of this Whistle-Blower Policy is to commit the Catholic Community Foundation of Los Angeles (the "Foundation") to the highest standards of financial reporting and lawful and ethical behavior. Additionally, the Foundation commits all employees, officers, and members of the Board of Directors (the "Board") to fully comply with all state and federal statutes, rules, and regulations.

### Reporting Procedure

The Foundation encourages all Board members, employees, consultants, and others affiliated with the Foundation to report any illegal or unethical conduct in connection with the Foundation's finances or other aspects of its operations.

1. Should any person know or have a reasonable belief that persons associated with the Foundation plan to engage or have engaged in illegal or unethical conduct in connection with the finances or other aspects of the Foundation's operations, that person should immediately report his or her concerns (the "Complaint") to the Foundation's President. An individual making such a Complaint may request anonymity or submit an anonymous written Complaint to the President. If the Complaint concerns the President, or the individual is not comfortable reporting to the President, then the Complaint may be made to or be filed with the Chair of the Board or any other member of the Board.
2. Upon receipt of a Complaint, the President shall immediately apprise the Chair of the Board of the Complaint and promptly investigate and respond to the individual filing the Complaint. Moreover, the President or the Chair of the Board shall report all Complaints (and their resolution, if applicable) to the Board at its next regularly scheduled meeting. If the President or the Chair of the Board believes it is warranted, the Complaint shall be promptly reported to the full Board (except to Board members who may be the subject of the Complaint), and the Board shall promptly investigate and respond to the individual filing the Complaint. If the Complaint is made to a Board member, such person shall take all appropriate action to promptly investigate and respond to the individual filing the Complaint.
3. All credible allegations will be followed up promptly, with further investigation conducted if needed to resolve disputed facts. In conducting any investigation, the party or parties conducting the investigation will respect any person's request for confidentiality and/or anonymity and will strive to keep the identity of other complainants as confidential as possible consistent with the need to conduct a thorough review and investigation. All records of Complaints and subsequent investigations shall be maintained in a confidential manner and in accordance with the Foundation's Document Retention Policy.

4. The Foundation will take appropriate action in response to any Complaints, including, but not limited to, disciplinary action (up to and including termination) against any person who has engaged in misconduct. Such misconduct shall be reported to the relevant civil or criminal authorities as may be required by law.

### **No Retaliation**

The Foundation will not knowingly take any action harmful to any person, including interference with lawful employment or livelihood, for reporting a Complaint in good faith pursuant to this policy or to law-enforcement officers, governmental agencies or bodies, or persons with supervisory authority over the complainant. Likewise, there will be no punishment or other retaliation for providing information regarding a Complaint in good faith to, or otherwise assisting in, any investigation regarding a Complaint conducted by the Foundation, law-enforcement officers, governmental agencies or bodies, or persons with supervisory authority over the complainant. An employee or other person affiliated with the Foundation who has made a Complaint or who provided information regarding a Complaint and who subsequently believes he or she has been subjected to retaliation should immediately report it to the President or the Chair of the Board. An individual who deliberately or maliciously provides false information, however, may be subject to disciplinary action (up to and including termination).

### **Posting of This Policy**

This policy is to be posted in the Foundation's office, on its website, and be provided to all directors and officers at the commencement of their initial term of office and to all employees upon commencement of their employment with the Foundation. The name and contact information of the President and the Chair of the Board shall accompany the posting or giving of this policy.

### **Catholic Community Foundation of Los Angeles**

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