



## WHISTLEBLOWER POLICY

### A: Reporting Requirements

All Inland Northwest Land Conservancy employees must promptly report in accordance with this policy any of the following situations of which the employee becomes aware or has reason to believe may exist:

1. any questionable or improper matters regarding bookkeeping, accounting, internal accounting controls or auditing matters;
2. any matters regarding wire, mail, bank, or securities fraud;
3. violations of any applicable law;
4. violations of any material policy of INLC; or
5. inappropriate handling or resolution of any complaint or matter previously reported under this policy.

Reports under this policy must be made to the Executive Director or, if it involves the Executive Director, then to the President of the Board of Directors. Such reports may be made in a way that identifies the reporter or anonymously, at the discretion of the reporting employee. Anonymous reporting may be accomplished in writing, by mail, e-mail, or other means. INLC will maintain the confidentiality of such reports to the extent feasible in view of its need to investigate and take applicable corrective action.

INLC's Equal Employment Opportunity and Harassment Policies (see Employee Handbook) require employees to report violations of those policies of which they are aware. Such reports may be made using the procedures set forth in either the Equal Employment Opportunity and Harassment Policies or this Whistleblower Policy.

INLC has an Open Door Policy (see Employee Handbook) that encourages employees to discuss work-related matters with their supervisor and/or the Executive Director or President of the Board of Directors. Employees are encouraged to utilize the procedures set forth in that policy for many types of workplace issues. Nonetheless, any matters of the type described in this policy must be reported in accordance with this policy and, to the extent that this policy conflicts with the Open Door Policy, this policy takes precedence.

## **B. Retaliation Prohibited**

No officer, employee, contractor, subcontractor or agent of INLC may take any action that is harmful to an employee, or discharge, demote, suspend, threaten, harass or in any other manner discriminate against an employee in the terms and conditions of employment because of any lawful act done by the employee:

1. to provide information, cause information to be provided or otherwise assist in an investigation regarding any conduct which the employee reasonably believes constitutes a violation of applicable law or fraud, when the investigation is brought by a governmental regulatory or law enforcement agency, a member of Congress, or a person with supervisory authority over the employee (or such other person working for INLT who has the authority to investigate, discover or terminate misconduct);
2. to file or cause to be filed, testify, participate in or otherwise assist in a proceeding filed or about to be filed relating to any of the matters described in this policy;
3. to report a complaint under the Organization's Equal Employment Opportunity or Harassment Policies;
4. to report a matter that the employee reasonably believes must be reported under Section A of this policy; or
5. to report truthful information relating to any state or federal offense to a law enforcement officer.

If an employee has reason to believe that he or she has been subjected to retaliation, the employee must immediately report such matters in accordance with Section A of this policy.

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### **Adopt-Review-Revise History**

- Reviewed by INLC Board on 9/25/2017
- Adopted by INLC Board on 9/25/2017.