

Gleanings For The Hungry Whistleblower Policy

Gleanings For The Hungry (Gleanings) requires directors, officers and staff members to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. As staff members and representatives of Gleanings, we must practice honesty and integrity in fulfilling our responsibilities and comply with all applicable laws and regulations.

Reporting Responsibility

This Whistleblower Policy is intended to encourage and enable staff members and others to raise serious concerns internally so that Gleanings can address and correct inappropriate conduct and actions. It is the responsibility of all board members, officers, staff members and volunteers to report concerns about violations of Gleanings code of ethics or suspected violations of law or regulations that govern Gleanings operations.

No Retaliation

It is contrary to the values of Gleanings for anyone to retaliate against any board member, officer, staff member 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 Gleanings. Any staff member who retaliates against someone who has reported a violation in good faith is subject to discipline up to and including ceasing the relationship.

Reporting Procedure

Gleanings has an open door policy and suggests that staff members share their questions, concerns, suggestions or complaints with the Compliance Officer. The Compliance Officer is required to report complaints or concerns about suspected ethical and legal violations in writing to the members of the Board of Directors who have the responsibility to investigate all reported complaints.

Compliance Officer

Gleanings Compliance Officer is responsible for ensuring that all complaints about unethical or illegal conduct are investigated and resolved. The Compliance Officer will advise the members of the Board of Directors of all complaints and their resolution and will report at least annually to the Board of Directors on compliance activity relating to accounting or alleged financial improprieties.

Accounting and Auditing Matters

Gleanings Compliance Officer shall immediately notify the Board of Directors Treasurer of any concerns or complaint regarding corporate accounting practices, internal controls or auditing and work with the Treasurer until the matter is resolved.

Acting in Good Faith

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.

Confidentiality

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.

Handling of Reported Violations

Gleanings Compliance Officer will notify the person who submitted a complaint and acknowledge receipt of the reported violation or suspected violation. All reports will be promptly investigated and appropriate corrective action will be taken if warranted by the investigation.

Compliance Officer: The Compliance Officer shall be a Board member or a third party designated by the Board to receive, investigate and respond to complaints.