

HUNGER FIGHTERS OREGON - WHISTLEBLOWER POLICY

Approved/Ratified on October 14, 2024

Article I

Purpose

Hunger Fighters Oregon (HFO) requires board members, officers, employees and volunteers (collectively “HFO personnel”) to observe high standards of business and personal ethics in conducting their duties and responsibilities. As HFO personnel and representatives of HFO, we must practice honesty and integrity in fulfilling our responsibilities, report improper activities in the workplace, and comply with all applicable laws and regulations. Accordingly, HFO will protect HFO personnel from retaliation for making any good faith reporting that complies with Article III of this policy. This policy is intended to supplement but not replace any applicable state and federal laws governing whistleblower rights and obligations.

Article II

Whistleblower Rights

HFO personnel have the right to report, without suffering retaliation, any activity within HFO or by HFO that HFO personnel reasonably believes:

- 1.) Violates any state or federal law;
- 2.) Violates or amounts to noncompliance with a state or federal rule or regulation; and/or
- 3.) Violates fiduciary responsibilities owed to HFO.

In addition, HFO personnel have the right to refuse to participate in any such activity enumerated immediately above without suffering retaliation.

However, the whistleblower reporting protections above do not entitle HFO personnel to disclose violations or suspected violations to non-HFO personnel. All HFO personnel must adhere to the confidentiality provisions in Article III and the HFO reporting process, also outlined in Article III.

Reporting Responsibility

This policy aims to encourage and enable HFO personnel to raise serious concerns internally to allow HFO to address and correct inappropriate conduct and actions. It is the responsibility of all HFO personnel to report concerns about violations of HFO’s code of ethics or suspected violations of law or regulations that govern HFO’s operations.

Retaliation Prohibited

It is contrary to HFO’s values for anyone to retaliate against any HFO member 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 HFO. An HFO member who retaliates against someone who has reported a violation in good faith is subject to discipline up to and including termination of employment and/or board member appointment.

Article III

Process for Reporting Potential Violation

HFO has an open door policy and suggests that HFO personnel share their questions, concerns, suggestions or complaints with their supervisor. 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 Board or another member of the Board's Executive Committee.

Supervisors and managers are required to report complaints or concerns about suspected ethical and legal violations in writing to HFO's Board President, who has the responsibility to investigate all reported complaints. HFO personnel with concerns or complaints may also submit their concerns in writing directly to their supervisor or the Board's Vice President if the Board President is implicated.

Confidentiality

Violations or suspected violations must be submitted on a confidential basis by the complainant. Unless confidentiality is prohibited or limited by law, the person reporting the violation must keep it confidential. In turn, HFO will keep reported violations and/or suspected violations confidential to the extent possible, consistent with the need to conduct an adequate investigation and/or any mandatory reporting requirements required by law.

Investigation and Accountability

HFO's Board President or Vice President 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.

HFO's Board President is responsible for ensuring that all complaints about unethical or illegal conduct are investigated and resolved, unless the allegation involves the Board President, in which case the Board Vice President shall be notified. The responsible Officer will advise the Hunger Fighters Oregon Board of all complaints and their resolution and will report the investigation and any compliance activity relating to accounting or alleged financial improprieties.

Accounting and Auditing Matters

The responsible HFO Board member shall immediately notify the Treasurer of any concerns or complaint regarding corporate accounting practices, internal controls or auditing and work with the Treasurer and Finance Committee until the matter is resolved.

Article IV

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.