

## Whistleblower Protection Policy

*Adopted by the Board of Directors September 18, 2011*

PEAK Grantmaking is committed to openness and ethical behavior, and its Board monitors adherence to all applicable local, state, and federal laws and regulations. PEAK Grantmaking values honesty and maintaining the highest ethical standards.

The whistleblower policy is intended to provide a mechanism for the reporting of alleged illegal activity or misuse of PEAK Grantmaking assets while protecting the persons who make such reports from retaliation.

It is the responsibility of all employees, Board members, and volunteers to report suspected misuse of funds, theft, fraud, and other financial irregularities, as well as perceived legal non compliance or wrongdoings. In no case will retaliation of any kind be tolerated against the person making a good faith report.

Reports should be made to the Board Secretary, who is responsible for prompt investigation. If the Secretary is involved in the matter being reported, then the report can be made to any other member of the Executive Committee. Reports can be made anonymously. The Board Secretary (or other member of the Executive Committee) will present investigation findings to the Executive Committee for determination of any further action regarding the matter. As appropriate, a summary of the investigation will be disclosed to the full Board.

Reports of retaliation will be investigated promptly in a manner to protect confidentiality as much as practicable, consistent with a full and fair investigation. The party conducting the investigation will notify the person making the report when the investigation has been completed.