

Native Seeds/SEARCH

Whistleblower Policy

Introduction

Best management practices dictate that the directors, officers and employees of *Native Seeds/SEARCH (NS/S)*, in the interest of transparency and accountability, observe high standards of business and personal ethics in the conduct of their duties and responsibilities. Employees and representatives of NS/S are expected to practice honesty and integrity in fulfilling their responsibilities and comply with all applicable laws, regulations, and organizational policy. This policy applies only to organizational matters and does not relate to private acts of an individual.

This NS/S policy document (hereafter referred to as the Whistleblower Policy) establishes procedures for directors, officers, and employees to report in confidence any complaints regarding suspected violation of law, regulation, or organizational policy; financial impropriety; or misuse of NS/S's resources.

No Retaliation

No director, officer or employee, who in good faith, reports a violation of the policy shall suffer harassment, retaliation or adverse employment consequence. An employee who retaliates against someone who has reported a violation in good faith is subject to discipline up to and including termination of employment. This Whistleblower Policy is intended to encourage and enable employees and others to raise serious concerns within NS/S prior to seeking resolution outside the organization.

Reporting Responsibility

It is the responsibility of all directors, officers and employees to comply with this Whistleblower Policy and to report violations or suspected violations.

Reporting Violations

NS/S maintains an open door policy and suggests that employees share their questions, concerns, suggestions or complaints with someone who can address them properly. In most cases, an employee's supervisor is in the best position to address an area of concern. However, if an employee is not comfortable speaking with their supervisor, or is not satisfied with their supervisor's response, the employee is encouraged to speak to the Director of Operations.

Supervisors and managers are required to report suspected legal or regulatory violations or violations of organizational policy to the Director of Operations, who has specific responsibility to investigate all reported violations. For suspected fraud, individuals should contact the Director of Operations directly. Board members and the Executive Director should report any suspected violations directly to the Chairperson of the Board of Directors.

NS/S's Director of Operations is responsible for investigating and resolving all reported complaints and allegations concerning violations and, as appropriate, shall advise the Executive Director. The

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Executive Director shall report to the Chairperson of the Board of Directors at least annually on compliance activity.

Handling of Reported Violations

The Director of Operations (or where appropriate, Chairperson of the Board of Directors) will notify the sender and acknowledge receipt of the reported violation or suspected violation within five business days. All reports will be promptly investigated and appropriate corrective action will be taken if warranted by the investigation.

Accounting and Auditing Matters

The Board of Directors, or a committee appointed by the Chairperson of the Board, shall address all reported concerns or complaints regarding corporate accounting practices, internal controls or auditing.

Acting in Good Faith

Anyone filing a 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 of law, regulation, or organizational policy. 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 or may be submitted anonymously. Reports of violations or suspected violations will be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation.

This policy is adapted from the National Council of Nonprofit Associations, 2004. The National Council of Nonprofit Associations (NCNA) is the network of state and regional nonprofit associations serving over 22,000 members in 46 states and the District of Columbia. NCNA links local organizations to a national audience through state associations and helps small and mid-sized nonprofits: manage and lead more effectively; collaborate and exchange solutions; save money through group buying opportunities; engage in critical policy issues affecting the sector; and achieve greater impact in their communities

My signature below indicates I have received and understand this policy.

_____ Signature

_____ Date