

**OVERFALLS FOUNDATION**  
**Whistleblower Policy**  
**9/12/18**

**Purpose:** To help ensure Board and committee members observe high standards of business and personal ethics in the conduct of duties in compliance with laws and regulatory requirements.

**Reporting Responsibility:** To encourage people involved with the Overfalls to share their questions, concerns and complaints to an authority who can address them properly. In most cases this will be the President or the Executive Director but can include another Director or outside counsel.

**No Retaliation:** No one who in good faith who reports a violation shall suffer adverse consequences. Anyone who retaliates against someone will be disciplined. This Overfalls' policy is intended to encourage and to enable persons to raise serious concerns.

**Compliance Officer:** The President and/or the Executive Director will act as the Overfalls' Compliance Officer. The President may ask for the assistance of another Board member to investigate a complaint. If a complaint is against the President or Executive Director, counsel may be hired.

**Financial Matters:** The Finance Committee will investigate concerns regarding accounting and controls and report the findings to the Board.

**Good Faith Requirement:** Anyone filing a complaint of a violation must be acting in good faith. Allegations that have been made maliciously or known to be false will be viewed as a serious offense.

**Confidentially:** Violations will be kept confidential, consistent with the need to conduct an adequate investigation.

**Reported Violations:** The Compliance Officer will acknowledge the reported violation to the complainant within 10 days.

Acknowledgement of Receipt

I hereby acknowledge that I have received a copy of the Whistleblower Policy of the Overfalls Foundation, have read it, understand it and agree to comply with its terms.

Susan C. Tolbert  
Signature

10/14/19  
Date

Susan C. Tolbert  
Printed Name