

**The New York-New Jersey Trail Conference  
Whistleblower Policy  
Approved by the Board, January 29, 2013**

**General**

The New York-New Jersey Trail Conference expects its officers, directors, employees and volunteers to observe high standards of honesty and integrity and comply with applicable laws and regulations in the conduct of their duties and responsibilities.

As used below in this policy, the term "Wrongful Conduct" refers to improper, dishonest or illegal activity. A "Whistleblower" as defined in this policy is an officer, director, employee or volunteer of the Trail Conference who reports activity that he or she considers to be Wrongful Conduct to one or more of the parties specified below in the "Reporting" section of this policy.

This Whistleblower Policy is intended to encourage and enable employees and others to raise serious concerns internally so that the Trail Conference can address and correct inappropriate conduct. The Whistleblower is not, however, responsible for investigating the activity or for determining fault or corrective measures; appropriate management officials are charged with these responsibilities.

**Reporting**

If an employee or volunteer has knowledge of or well-founded suspicion concerning Wrongful Conduct:

- the employee or volunteer shall report to the Executive Director, unless he or she believes that the Executive Director is involved or unresponsive, in which case:
- the employee or volunteer shall report to any of the following: the Board Chair, Vice Chair, Board Secretary or Counsel to the Board.

If an officer or director of the Trail Conference has knowledge of or well-founded suspicion concerning Wrongful Conduct, the officer or director shall report to any of the following: the Board Chair, Vice Chair, Board Secretary, Counsel to the Board or the Executive Director.

**Examples of Actions to be Reported**

The following are examples of Wrongful Conduct required to be reported: violations of federal, state or local laws; serious violations of adopted Trail Conference policies for personal financial gain; fraudulent activity, including but not limited to billing for services not performed, or for goods not delivered, or for expenses not incurred; self-dealing for personal gain in connection with negotiations or transactions with third parties; or, except as may be authorized by the Board, the use of Trail Conference property, resources or authority for personal gain or other non-Trail Conference purpose. The foregoing examples are illustrative and are not intended to exclude other instances of Wrongful Conduct that must be reported under this policy.

### **Acting in Good Faith**

Anyone reporting Wrongful Conduct must be acting in good faith and have reasonable grounds for believing that the information disclosed indicates Wrongful Conduct. 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**

Insofar as possible, the confidentiality of the Whistleblower will be maintained. However, identity may have to be disclosed to conduct a thorough investigation, to comply with applicable law or to provide accused individuals their legal rights of defense.

### **No Retaliation**

No Whistleblower who in good faith reports Wrongful Conduct will suffer harassment, retaliation or adverse consequence to employment or other position with the Trail Conference. Any director, officer, employee or volunteer who retaliates against anyone who has reported Wrongful Conduct in good faith is subject to discipline up to and including termination of employment or removal from the Board of Directors, as applicable.

### **Handling of Reported Wrongful Conduct**

Promptly following the delivery of a report of Wrongful Conduct in the manner specified above in the "Reporting" section in this policy, the report shall be submitted to the Executive Director, Counsel to the Board and Board Chair, who (excepting any of the foregoing alleged to be involved in the Wrongful Act) are together responsible for investigating and coordinating corrective and/or disciplinary action.