Whistleblower Protection Policy

Good business practice requires members of the Board of Trustees, members of the Friends of PPLD, and all employees to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. As employees and representatives of the Library District, we must practice honesty and integrity in fulfilling our responsibilities and comply with all applicable laws and regulations.

<u>Reporting Responsibility</u>: It is the responsibility of members of the Board of Trustees, members of the Friends of PPLD, and all employees to comply with Library District policies and state and federal laws and to report violations or suspected violations in accordance with this policy.

No Retaliation: No one who in good faith reports a violation of Library District policy or state or federal law 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 policy is intended to encourage and enable employees and others to raise serious concerns within the organization prior to seeking resolution outside the organization.

Reporting Violations: The Library District's business standard is to have an open door policy, which 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 a supervisor or is not satisfied with the response, that individual is encouraged to speak with another manager. Supervisors and managers are required to report suspected violations of policy or law to the Library District's Compliance Officer, who has specific and exclusive responsibility to investigate all reported violations. An individual who suspects fraud or is not comfortable following the Library District's open door policy should contact the Compliance Officer directly. In the event the Library Director is suspected of violations of policy or law, then individuals should contact the President of the Board of Trustees, who shall coordinate an investigation.

<u>Compliance Officer</u>: The Compliance Officer is responsible for investigating and resolving all reported complaints and allegations concerning violations, and at his discretion, shall inform the Board of Trustees of such issues. The Compliance Officer is required to report to the Board of Trustees at least annually on compliance activity. The Library District's Compliance Officer is the Library Director.

<u>Accounting and Auditing Matters</u>: The Finance Committee of the Board of Trustees shall address all reported concerns or complaints regarding accounting practices, internal controls or auditing. The Compliance Officer shall immediately notify the Finance Committee of any such complaint and work with the Committee until the matter is resolved.

Acting in Good Faith: Anyone filing a complaint concerning a violation or suspected violation of Library District policies or law 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.

<u>Confidentiality</u>: Violations or suspected violations may be submitted on a confidential basis by the complainant. Reports of violations or suspected violations will be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation.

<u>Handling of Reported Violations</u>: The Compliance Officer 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, up to and including notification of civil authorities, will be taken if warranted by the investigation.