



Whistleblower Protection

In keeping with the policy of maintaining the highest standards of conduct and ethics, NOCO Humane will investigate suspected fraudulent or dishonest conduct by staff, board members, consultants, or volunteers.

Staff, board members, consultants, volunteers, or others are encouraged to report suspected fraudulent or dishonest conduct (i.e., to act as “whistleblower”), pursuant to the procedures set forth below.

Whistleblower

An employee, board member, consultant, volunteer, or other party who informs a supervisor, Director of Human Resources, CEO, or Chair of the Board of Directors about an activity relating to NOCO Humane which that person, in good faith, believes to be fraudulent or dishonest.

Fraudulent or Dishonest Conduct

A deliberate act, or failure to act, with the intention of obtaining an unauthorized benefit. Examples of such conduct include, but are not limited to:

- Forgery or alteration of documents
- Unauthorized alteration or manipulation of computer files
- Fraudulent financial reporting
- Pursuit of a benefit or advantage in violation of NOCO Humane Conflict of Interest Policy
- Misappropriation or misuse of NOCO Humane resources, such as funds, supplies, or other assets
- Authorizing or receiving compensation for goods not received or services not performed
- Authorizing or receiving compensation for hours not worked

Making a report

If an employee suspects fraudulent or dishonest conduct or conduct in violation of the law, he or she may report it, anonymously if the employee wishes, and will be protected against any form of harassment, intimidation, discrimination, or retaliation for making such a report in good faith.

Employees can make a report to the CEO or Director of Human Resources at any time. NOCO Humane will promptly conduct an investigation into matters reported, keeping the informant’s identity as confidential as practicable, consistent with our obligation to conduct a full and fair investigation. If the conduct involves both the CEO and Director of Human Resources, the employee should make a report to the Chair of the Board of Directors who can be reached via email to boardchair@nocohumane.org, or in writing to NOCO Humane, c/o Board Chairperson, 3501 E 71st Street, Loveland, CO 80538, marked “Confidential.”

No Retaliation

An employee who has made a report of suspected fraudulent or dishonest conduct and who subsequently believes he or she has been subjected to retaliation of any kind by any NOCO Humane employee is directed to immediately report it to the CEO or Director of Human Resources as appropriate. If the conduct involves both the CEO and Director of Human Resources, the employee should make a report to the Chair of the Board of Directors.

Reports of retaliation will be investigated promptly in a manner intended to protect confidentiality as much as practicable, consistent with a full and fair investigation.

NOCO Humane strongly disapproves of and will not tolerate any form of retaliation against employees who report concerns in good faith regarding NOCO Humane's operations. Any employee who engages in such retaliation will be subject to discipline up to and including termination.

Baseless Allegations

Allegations made with reckless disregard for their truth or falsity. Individuals making such allegations may be subject to disciplinary action by NOCO Humane, and/or legal claims by individuals accused of such conduct.

Rights and Responsibilities

Supervisors

Supervisors are required to report suspected fraudulent or dishonest conduct to the CEO or Director of Human Resources. Reasonable care should be taken in dealing with suspected misconduct to avoid:

- Baseless allegations
- Premature notice to persons suspected of misconduct and/or disclosure of suspected misconduct to others not involved with the investigation
- Violations of a person's rights under law

Due to the important yet sensitive nature of the suspected violations, effective professional follow-up is critical. Supervisors, while appropriately concerned about resolving such issues, should not in any circumstances perform any investigative or other follow-up steps on their own. Accordingly, a supervisor who becomes aware of suspected misconduct:

- Should not contact the person suspected to further investigate the matter or demand restitution
- Should not discuss the case with attorneys, the media, or anyone other than the CEO or Director of Human Resources
- Should not report the case to an authorized law enforcement officer without first discussing the case with the CEO or Director of Human resources

Investigation

All relevant matters, including suspected but unproved matters, will be reviewed and analyzed, with documentation of the receipt, retention, investigation, and treatment of the complaint. Appropriate corrective action will be taken, if necessary. Investigations may warrant investigation by independent persons such as auditors and/or attorneys.

The CEO will inform the chair of the Board of Directors of any Whistleblower report. The CEO will acknowledge receipt of the reported Wrongful Conduct or suspected Wrongful Conduct within five business days, unless such report was submitted anonymously.

Revised April 14, 2021