

Any concerns or perceived wrongdoing regarding our financial stewardship should be reported to Whistleblower@unitedwayokc.org

Whistleblower Policy

United Way of Central Oklahoma (UWCO) is committed to fair, accurate, and transparent accounting of its financial matters and requires full compliance with all applicable laws and regulations, accounting standards, accounting controls, and practices.

UWCO requires employees and volunteers to observe high standards of business and personal ethics in their duties and responsibilities. Employees and representatives of the organization must practice honesty and integrity in fulfilling their responsibilities and comply with all applicable laws and regulations.

The objectives of the UWCO's Whistleblower Policy are to establish policies and procedures for the following:

- The submission of concerns regarding questionable accounting or audit matters by employees, directors, officers, volunteers, and other stakeholders of the organization, on a confidential basis.
- The receipt, retention, and treatment of complaints received by the organization regarding accounting, internal controls, or auditing matters.
- The protection of employees, donors, volunteers, and other stakeholders who report concerns about retaliatory action.

Reporting Concerns

Any person, donor, volunteer, or employee of the UWCO who has complaints or concerns about UWCO's accounting, internal accounting control, or auditing matters, or who becomes aware of questionable accounting or auditing matters is strongly encouraged to report such matters to one of the following individuals or methods:

- President and CEO
- Board Chair
- Ethics and Diversity Chair
- Whistleblower Email- whistleblower@unitedwayokc.org – this email address will send information directly to United Way's President and CEO, the Board Chair and the Ethics and Diversity Chair collectively.

Procedure Overview

- Accounting concerns received by the President and CEO will promptly be forwarded to the Ethics & Diversity Chair and Board Chair, who will record the receipt of all accounting concerns.

- The Board Chair and the Ethics & Diversity Chair will review and evaluate each accounting concern and make an initial determination as to whether it should be investigated, and if so, may designate an appropriate UWCO employee(s) and/or UWCO volunteer(s) to conduct such investigation. In addition, the Board Chair and the Ethics & Diversity Chair have the authority to assign the handling or investigation of any accounting concerns, including the retention of outside counsel or advisors.

The Board Chair or Ethics & Diversity Chair shall also report the accounting concerns to the Executive Committee.

- The Board Chair or Ethics & Diversity Chair may contact the individual submitting an accounting concern, if known and to the extent appropriate, to inform such person of the results of any investigation and what corrective action has been recommended or taken.
- When asked, employees shall fully and completely cooperate with such investigations. Failure to cooperate, or interfering with an investigation, shall subject employee(s) to immediate disciplinary action, up to and including termination.
- Records of Whistleblower concerns will be retained by the UWCO President and CEO or Vice President of Human Resources for not less than three (3) years after the accounting concern has been received, investigated, and closed.

Acting in Good Faith/No Retaliation

Any UWCO employee must be able to submit in good faith and have reasonable grounds for believing the information disclosed indicates an improper accounting or auditing practice or a violation of UWCO's Policies and Procedures. The Whistleblower Policy is intended to encourage and enable donors, volunteers, and employees to raise concerns within the UWCO for investigation and appropriate action. With this goal in mind, it shall be a violation of this policy, and grounds for disciplinary action up to and including termination of employment for any UWCO employee to discharge, demote, suspend, threaten, harass, or in any other matter retaliate against a UWCO employee because of their submission in good faith of an accounting concern. If UWCO determines the complaint was not made in good faith or that an employee provided false information to the investigator, the employee may be subject to discipline, up to and including termination.

Confidentiality

Reports of concern, and investigations, will be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation. Disclosure of reports of concerns to individuals not involved in the investigation will be viewed as a serious disciplinary offense and may result in discipline, up to and including termination of employment.