

## WHISTLEBLOWER POLICY

- The Mountain Top Library requires Trustees and staff to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. We must practice honesty and integrity in fulfilling our responsibilities and comply with all applicable laws and regulations.
- It is the responsibility of all Trustees and staff to report ethics violations or suspected violations in accordance with this Whistleblower Policy.
- No Trustee, or employee who in good faith reports an ethics violation 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 Whistleblower Policy is intended to encourage and enable employees and others to raise serious concerns within the Mountain Top Library prior to seeking resolution outside the library.
- In most cases an employee's supervisor is in the best position to address an area of concern. However, if you are not comfortable speaking with your supervisor or you are not satisfied with your supervisor's response, you are encouraged to speak with someone in management whom you are comfortable approaching. Supervisors and managers are required to report suspected ethics violations to the library's Compliance Officer, who has specific and exclusive responsibility to investigate all reported violations. If you are not comfortable in following this policy, individuals should contact the library's Compliance Officer directly.
- The library's Compliance Officer is responsible for investigating and resolving all reported complaints. At his/her discretion he/she shall advise the Board President and/or the Board.
- The Board (or its audit committee) shall address all reported concerns regarding corporate accounting practices, internal controls or auditing. The Compliance Officer shall immediately notify the Board (or its audit committee) of any such complaint and work with the Board (or committee) until the matter is resolved.
- Anyone filing a complaint concerning a violation or suspected violation must be acting in good faith and have reasonable grounds for believing the information disclosed indicates a violation. Any allegations which prove to have been made maliciously or knowingly to be false will be viewed as a serious disciplinary offense.
- Violations or suspected violations may be submitted on a confidential basis by the complainant or may be submitted anonymously. Such reports will be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation.
- The Compliance Officer will notify the sender and acknowledge receipt of the reported violation or suspected violation within 5 business days. All reports will be promptly investigated and appropriate corrective action will be taken if warranted by the investigation.

Compliance Officer: Ms. Ellen Manfredi  
Contact: [clumhill@verizon.net](mailto:clumhill@verizon.net)  
President of Board of Trustees: Susan Kleinfelder  
Contact: [sdefk@aol.com](mailto:sdefk@aol.com)

\*Updated 2019  
(adapted from National Council of Nonprofit Associations, 2008)

