

SUSTAINABLE ENVIRONMENTAL ADVOCACY AND DEVELOPMENT

Whistleblower Policy

Board Governance Policy

Adopted by Board of Trustees	_____
Effective Date	_____
Next Review	_____

1. Purpose

Sustainable Environmental Advocacy and Development (SEAD) is committed to lawful, ethical, transparent, and accountable conduct. This policy provides a process for trustees, officers, employees, volunteers, contractors, and other persons associated with SEAD to report in good faith suspected misconduct without fear of retaliation.

2. Matters That May Be Reported

Concerns may include, but are not limited to:

- Fraud, theft, embezzlement, misuse of funds or assets, or falsification of records;
- Material violations of law, regulation, grant requirements, contractual obligations, or SEAD policies;
- Improper accounting, internal-control, financial-reporting, or recordkeeping practices;
- Conflicts of interest that have not been properly disclosed or addressed;
- Serious threats to health, safety, safeguarding, or the environment arising from SEAD activities;
- Retaliation against a person who makes a good-faith report or participates in an investigation;
- or
- Efforts to conceal, destroy, alter, or falsify information related to suspected misconduct.

3. Good-Faith Reporting

A person making a report should have a reasonable basis for believing the information disclosed indicates possible misconduct. A report does not need to be proven before it is made. Knowingly making a false or malicious allegation is not protected by this policy and may result in appropriate action.

4. How to Report a Concern

A concern should ordinarily be reported promptly to the President/Executive Director or other designated senior official. If the concern involves that person, presents a conflict, or the reporter is uncomfortable using that channel, the report should be made directly to the Chair of the Board of Trustees or another disinterested trustee designated by the Board.

Reports may be made orally or in writing. A written report should, when possible, describe the conduct, relevant dates, persons involved, supporting documents or evidence, and any steps already taken. SEAD may establish additional reporting channels as its operations grow.

5. Confidentiality and Anonymous Reports

SEAD will handle reports as confidentially as reasonably possible, consistent with the need to conduct a fair and thorough review, comply with law, protect individuals, and take corrective action. Anonymous reports may be accepted; however, anonymity can limit SEAD's ability to investigate or obtain additional information.

6. Non-Retaliation

SEAD prohibits retaliation against any person who, in good faith, reports a concern, seeks guidance about suspected misconduct, refuses to participate in conduct reasonably believed to be unlawful, or cooperates in an investigation or proceeding. Prohibited retaliation may include termination, demotion, harassment, intimidation, threats, discrimination, reduction of responsibilities, or other adverse action because of protected reporting or participation.

Any person who believes retaliation has occurred should report it immediately through the channels described in this policy. A person who engages in retaliation may be subject to corrective or disciplinary action, up to and including removal or termination, as applicable.

7. Review and Investigation

Reports will be directed to a person or group that is sufficiently independent of the matter being reported. The reviewer may acknowledge receipt, conduct a preliminary assessment, request documents or interviews, preserve relevant records, consult legal or other professional advisors when appropriate, and determine whether further investigation is warranted.

Trustees, officers, employees, volunteers, and contractors are expected to cooperate honestly with authorized investigations. No person who is the subject of a report, has a material conflict, or lacks appropriate independence should control the investigation or final disposition of that report.

8. Corrective Action and Escalation

If misconduct is substantiated, SEAD will take reasonable corrective action appropriate to the circumstances. This may include strengthening controls, correcting records, recovering funds or property, modifying procedures, disciplinary action, reporting to a funder or governmental authority when required, or seeking legal or professional advice.

9. Recordkeeping

SEAD will maintain records of whistleblower reports, investigations, findings, and responsive actions in accordance with its document-retention practices and applicable legal requirements. Records relating to an active or reasonably anticipated investigation, audit, claim, subpoena, or litigation must not be destroyed or altered.

10. No Limitation on Legal Rights

Nothing in this policy is intended to prevent or discourage a person from reporting possible violations directly to a governmental agency, law-enforcement authority, regulator, funder, or other entity when permitted or required by law. This policy does not require prior internal reporting when external reporting is legally protected.

11. Administration

The Board of Trustees is responsible for oversight of this policy. Management may establish reasonable procedures to implement it, provided those procedures remain consistent with Board oversight, independence, confidentiality, non-retaliation, and applicable law.

12. Annual Review and Acknowledgment

SEAD should periodically review this policy and make it reasonably available to persons covered by it. Trustees, officers, key employees, and other designated persons may be asked to acknowledge that they have received, read, and agree to comply with the policy.

Whistleblower Policy Acknowledgment

I acknowledge that I have received, read, and understand SEAD's Whistleblower Policy and understand the available reporting channels and SEAD's prohibition against retaliation.

Name: _____

Position/Role: _____

Signature: _____

Date: _____