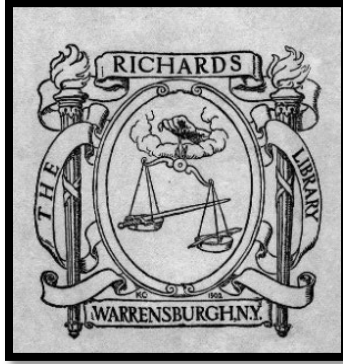


# The Richards Library



## Whistleblower Policy

The following are rules and regulations approved by The Richards Library Board of Trustees. These rules are effective March 9, 2021 and will be reviewed every 5 years.

### **General**

The Richards Library (the Library) requires Trustees, the Director, employees (part-time and qualified substitutes) [hereby also referred to as Protected Persons] who provide substantial services to the Library to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. Representatives of the Library must practice honesty and integrity in fulfilling their responsibilities and comply with all applicable laws and regulations.

The Objective of this Whistleblower Policy is to encourage and enable Protected Persons without fear of retaliation, to raise concerns regarding suspected unethical or illegal conduct on a confidential or anonymous basis so that the Library can address and correct inappropriate conduct.

### **Reporting Responsibility**

It is the responsibility of all Protected Persons to report in good faith any concerns they may have regarding actual or suspected activities which may be illegal or in violation of Library policies or ethical or legal standards of any kind.

### **No Retaliation**

No Protected Person who in good faith reports an actual or suspected ethics or legal violation shall suffer harassment, retaliation or adverse employment consequence. Any Trustee or Staff member who retaliates against someone who has reported such a violation in good faith is subject to discipline, up to and including, termination of employment.

### **Reporting Violations**

Protected Persons should report their questions, concerns, suggestions or complaints to the Compliance Officer. Trustees, officers, the Director and all employees are required to report suspected ethics violations to the Library's Compliance Officer, who has specific and exclusive

responsibility to investigate all reported violations. The Library's Compliance Officer is the current President of The Board of Trustees. Protected Persons may contact the Library's Compliance Officer directly.

### **Compliance Officer**

The Library's Compliance Officer is responsible for investigating and resolving all reported complaints and allegations concerning violations and, at their discretion, shall advise The Board of Trustees. The Compliance Officer has direct access to The Board of Trustees and is required to report to The Board of Trustees at least annually on compliance activity.

### **Accounting and Auditing Matters**

The Financial Officer and Treasurer shall address all reported concerns or complaints regarding corporate accounting practices, internal controls or auditing. The Compliance Officer shall immediately notify The Board of Trustees of any such complaint and work with the Board until the matter is resolved.

### **Acting in Good Faith**

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 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.

### **Confidentiality**

Violations or suspected violations may be submitted on a confidential basis by the Protected Person. Reports of violations or suspected violations will be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation.

### **Handling of Reported Violations**

The Compliance Officer will notify the Protected Person and acknowledge receipt of the reported violation or suspected violation within five (5) business days. All reports will be promptly investigated and appropriate corrective action will be taken if warranted by the investigation.

### **Compliance Officer: Current President of The Board of Trustees**

**Distribution: A copy of this policy is to be distributed to all Trustees, the Director and all employees (part-time and qualified substitutes) who provide substantial services to the Library.**

Policy Developed and Modified from The Crandall Library Whistleblower Policy

**Approved and Adopted by The Richards Library Board of Trustees: March 9, 2021  
Revised, Reviewed and Approved: June 7, 2022**