



Meals on Wheels of Takoma Park/Silver Spring Whistleblower Protection Policy

Washington DC Meals on Wheels, Inc. dba Meals on Wheels of Takoma Park/Silver Spring (“Meals on Wheels”) expects directors, officers, employees, and volunteers to fulfill their responsibilities with honesty and integrity, and to comply with all applicable laws and regulations. This Whistleblower Protection Policy (“this Policy”) is designed to encourage and enable persons to raise serious concerns internally so that Meals on Wheels can address and correct inappropriate conduct and actions.

Directors, officers, employees and volunteers shall confer with the Human Resources Consultant, if any, to address any questions, concerns, suggestions and complaints prior to making a report pursuant to these procedures. If Meals on Wheels has contracted with a Human Resources Consultant, the Consultant’s contact information shall be provided to staff.

Reporting Responsibility

This Whistleblower Policy is intended to encourage and enable employees and others to raise serious concerns internally so that Meals on Wheels can address and correct inappropriate conduct and actions. It is the responsibility of all board members, officers, employees and volunteers to report concerns about violations of Meals on Wheels’ code of ethics or suspected violations of law or regulations that govern Meals on Wheels’ operations.

It is the responsibility of all directors, officers, employees and volunteers to report concerns about violations or potential violations of laws, regulations, ethical rules or any policy of Meals on Wheels, including but not limited to the following types of matters:

- a. Questionable financial practices, including, but not limited to, misuse or wasting of Meals on Wheels’ assets, the circumvention or attempted circumvention of accounting procedures or internal controls or conduct that would otherwise constitute a violation of Meals on Wheels’ financial policies;
- b. Fraudulent activities;
- c. Conflicts of interest;
- d. Failure to comply with applicable legal, regulatory or ethical requirements; and
- e. Acts of retaliation, harassment, discrimination or intimidation against directors, officers, employees or volunteers.

This includes the obligation to report concerns about one’s own conduct.

Reporting Procedure

If an employee believes that any of the above concerns are or might be taking place, such a report must be submitted in writing to their supervisor or to an Officer of the Board, any of whom then assumes the role of Compliance Officer for this complaint and has the responsibility to investigate all reported complaints. The Compliance Officer will advise the Executive Director and/or the Board of Directors of all complaints and their resolution and will immediately notify the Treasurer, or another Officer of the Board if the concern is about the Treasurer, on compliance activity relating to accounting or alleged financial improprieties.

Acting in Good Faith

Anyone filing a written 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 complainant. Reports of violations or suspected violations will be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation.

No Retaliation

It is contrary to the values of Meals on Wheels for anyone to retaliate against any board member, officer, employee or volunteer who in good faith reports an ethics violation, or a suspected violation of law, such as a complaint of discrimination, or suspected fraud, or suspected violation of any regulation governing the operations of Meals on Wheels. 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.