



Policy for Colorado Foundation for Agriculture, Inc., dba Colorado Agriculture in the Classroom

WHISTLEBLOWER PROTECTION POLICY

Policy

The objective of Whistleblower Policy for Colorado Agriculture in the Classroom (CoAITC) is to establish a policy for the protection of board of directors, advisory board members, committee members, employees, contractors, volunteers, and any other organizational leader from retaliation, harassment, or adverse employment consequences to complaints of organizational wrongdoing.

Procedure

CoAITC encourages directors, advisors, committee members, employees, contractors, or volunteers to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. Employees and representatives of the organization should practice honesty and integrity in fulfilling their responsibilities and comply with all applicable laws and regulations.

Reporting Responsibility

Each director, advisor, employee, volunteer, contractor, and committee member of CoAITC is encouraged and enabled to report concerns about violations of CoAITC's Code of Ethics or suspected violations of law or regulations that govern CoAITC's operations in accordance with this Whistleblower Policy.

Authority of the Governance Committee

All reported concerns will be forwarded to the CoAITC Governance Committee in accordance with the procedures set forth herein. The governance committee shall be responsible for investigating, and making appropriate recommendations to the board of directors, with respect to all reported concerns.

No Retaliation

It is contrary to the values of CoAITC for anyone to retaliate against, harass, or intimidate any director, advisor, committee member, employee, contractor, or volunteer who in good faith reports an ethics violation, or a suspected violation of law, such as a complaint of discrimination, suspected fraud, suspected abuse, or suspected violation of any regulation governing the operations of CoAITC. A director, advisor, volunteer, employee, contractor, or committee member who retaliates against someone who has reported a violation in good

faith is subject to discipline up to and including dismissal from the volunteer position or termination of employment.

Reporting Procedure

CoAITC has an open door policy and suggests that directors, advisors, committee members, employees, contractors, or volunteers share their questions, concerns, suggestions, or complaints with the CoAITC Executive Director. However, if the individual is not comfortable speaking with the executive director about their concern, he/she/they are encouraged to speak to any member of the CoAITC Board of Directors with whom they are comfortable in approaching. The executive director and board directors are required to report suspected concerns to the chairperson of the CoAITC Governance Committee.

For suspected fraud or legal violation, or when directors, advisors, committee members, employees, contractors, and volunteers are not satisfied or are uncomfortable with following the open door policy, individuals should submit concerns in writing to the chairperson of the CoAITC Governance Committee. Contact information for the governance committee chairperson may be obtained from the CoAITC Executive Director.

Handling of Reported Violations

The governance committee shall address all reported concerns. The committee chair shall notify the committee and the CoAITC Board President and Executive Director of any such report within five business days. The committee chair will notify the sender and acknowledge receipt of the concern within seven business days, if possible. It will not be possible to acknowledge receipt of anonymously submitted concerns.

All reports will be investigated by the governance committee, and appropriate corrective action will be recommended to the board of directors, if warranted by the investigation. In addition, action taken must include a conclusion and/or follow-up with the complainant for complete closure of the concern.

The governance committee has the authority to retain outside legal counsel, accountants, private investigators, or any other resource deemed necessary to conduct a full and complete investigation of the allegations.

Acting in Good Faith

Anyone reporting 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. The act of making allegations that prove to be unsubstantiated, and that prove to have been made maliciously, recklessly, or with the foreknowledge that the allegations are false, will be viewed as a serious disciplinary offence and may result in discipline, up to and including dismissal from the volunteer position or termination of employment. Such conduct may also give rise to other actions, including civil lawsuits.

Confidentiality

Reports on concerns, and investigations pertaining thereto, shall be kept confidential to the extent practical, 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 dismissal from

the volunteer position or termination of employment. Such conduct may give rise to other actions, including civil lawsuits.

Illustrative Types of Concerns

The following is a list of some of the kinds of improprieties that should be reported:

- Supplying false or misleading information on the organization's financial statement or other public documents, including its tax returns.
- Providing false information to or withholding material information from the organizations auditors or trustees.
- Embezzling, self-dealing, private inurement, and private benefit (earnings or assets used for personal gain or benefit).
- Violating the organization's Conflict of Interest Policy.
- Paying for services or goods that are not rendered or delivered.
- Facilitating or concealing any of the above or similar actions.

ACCEPTANCE OF WHISTLEBLOWER POLICY

The Colorado Agriculture in the Classroom Board of Directors has received a copy of, read and understood, and agreed to comply with the terms and conditions of this Whistleblower Policy.

Approved and accepted on November 1, 2023.

Keri Powers

[Keri Powers \(Nov 20, 2023 07:02 PST\)](#)

Keri Powers, CoAITC Board of Directors President

Nov 20, 2023

Date