



WHISTLEBLOWER PROTECTION POLICY

Clifton Town Meeting (“CTM”) requires its Trustees to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. Trustees must practice honesty and integrity in fulfilling their responsibilities and must comply with all applicable laws and regulations.

1. Reporting Responsibility

This Whistleblower Protection Policy (the “Policy”) is intended to encourage and enable the Board, individual Trustees, community volunteers, and others to raise serious concerns internally so that CTM can address and correct inappropriate conduct and actions. It is the responsibility of all Trustees to report concerns about violations of CTM’s rules and regulations, or suspected violations of law or regulations that govern CTM’s operations.

2. No Retaliation

It is contrary to CTM’s values for anyone to retaliate against any Trustee or volunteer who in good faith reports an ethics violation, or a suspected violation of law such as a complaint of discrimination, suspected fraud, or suspected violation of any regulation governing CTM’s operations. A Trustee or volunteer who retaliates against someone who has reported a violation or suspected violation in good faith is subject to discipline up to and including removal as a Trustee by majority vote of the Board.

3. Reporting And Investigation Procedure

CTM has an open door policy and suggests that individuals share their questions, concerns, suggestions, or complaints with any Trustee. If a question, concern, suggestion, or complaint pertains to the work of one of CTM’s committees, you are encouraged to speak with the Chairperson of that committee. If you are not comfortable speaking with the Chairperson of the committee or are not satisfied with such Trustee’s response, individuals are encouraged to speak with a member of CTM’s Executive Committee.

Trustees are required to report complaints or concerns about suspected ethical and legal violations in writing to CTM’s President. The President is responsible for ensuring that all complaints about unethical or illegal conduct are investigated and resolved. The President will notify the person who submitted a complaint and acknowledge receipt of the reported violation or suspected violation. All reports will be promptly investigated and appropriate corrective action will be taken if warranted by the investigation. The President will advise the Board of all complaints and their resolution.

If a complaint or concern involves the President's conduct, the President shall recuse him- or herself from the investigation. The investigation shall then be conducted by the first member of the Board not involved in the complaint, in the following order: First Vice President, Second Vice President, Treasurer, Secretary, longest serving Trustee. In the event there is a tie for longest serving Trustee, they shall jointly conduct the investigation.

4. 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 to be unsubstantiated and made maliciously or with knowledge of their falsity will be cause for discipline up to and including removal as a Trustee by majority vote of the Board.

5. 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.

6. Approval And Effective Date

This Policy was approved by the Board of Trustees of CTM on August 27, 2019. It is effective as of the date it was approved.