

Whistleblower Policy

Adopted by motion of Board of Directors of
Erie to Pittsburgh Trail Alliance (EPTA) on _____, 2018
Effective upon Adoption

The Erie to Pittsburgh Trail Alliance (EPTA) is committed to facilitating open and honest communications relevant to its governance, finances, and compliance with all applicable laws and regulations. EPTA requires members of the Board of Directors and employees to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. Employees and representatives of the organization must practice honesty and integrity in fulfilling their responsibilities and comply with all applicable laws and regulations.

This Whistleblower Policy reflects the practices and principles of behavior that support this commitment. It is important that EPTA be apprised about unlawful or improper workplace behavior including, but not limited to, any of the following conduct:

- Theft;
- Financial reporting which is fraudulent, intentionally misleading or negligent;
- Improper or undocumented financial transactions;
- Forgery or alternation of documents;
- Unauthorized alteration or manipulation of computer files;
- Improper destruction of documents;
- Improper use of EPTA assets, including, but not limited to its funds, supplies, intellectual property and other assets;
- Improper access and/or use of confidential donor information;
- Authorizing or receiving compensation for goods not received or services not performed;
- Any other improper occurrence regarding cash, financial procedures, or reporting;
- Violations of EPTA's conflict-of-interest policy;
- Any abuse of or discrimination against an EPTA vendor; and
- Failure by EPTA to provide reasonable accommodation for disability or religious belief.

Employees and directors should feel free to raise issues of concern, in good faith, without fear of retaliation. Members of the Board of Directors and employees will not be disciplined, demoted, or be retaliated against for asking questions or voicing concerns about conduct of this sort. Interested persons are encouraged to report any such improprieties without fear of retaliation or intimidation. In order to encourage the reporting of such wrongful actions against EPTA's interest, this Whistleblower Policy also applies to situations involving harassment and/or discrimination.

EPTA will investigate any possible fraudulent or dishonest use or misuse of EPTA's resources, or abuse, discrimination or a failure to provide reasonable accommodation by directors. The Board of Directors for EPTA will take appropriate action against anyone found to have engaged in fraudulent, dishonest, abuse or discriminatory conduct, including disciplinary action by EPTA, or civil or criminal prosecution when warranted. Board action will require a majority vote of the Board of Directors.

Anyone reporting a concern must act in good faith and have reasonable grounds for believing the information disclosed indicates an improper accounting or auditing practice, or a violation of EPTA's policies. 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 offense and may result in discipline, up to and including dismissal from the Board of Directors position. Such conduct may also give rise to other actions, including civil lawsuits.

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NOTE: This draft policy is based on a model policy furnished by PANO (Pa. Association of Non-Profit Organizations), of which EPTA is a member.