

RESOLUTION

WHEREAS, the Board of Trustees finds that all officers and employees of the Village should be encouraged to communicate openly and freely on matters of concern, and

WHEREAS, the Board of Trustees finds that such communication is enabled by adoption of a municipal policy on this matter,

NOW THEREFORE IT IS RESOLVED that the following policy shall be in effect in the Village of Shoreham:

Purpose

The Village of Shoreham ("Village") is committed to high standards of ethical, moral and legal business conduct. In line with this commitment and the Village's commitment to open communication, this policy aims to provide an avenue for employees to raise concerns and reassurance that they will be protected from reprisals or victimization for whistleblowing.

This whistleblowing policy is intended to cover protections for you if you raise concerns regarding the Village regarding:

- unlawful activity
- incorrect financial reporting
- fraudulent or dishonest conduct
- activities that are not in line with the policies or the intentions of the Village

Safeguards

Harassment or Victimization - Harassment or victimization for reporting concerns under this policy will not be tolerated.

Confidentiality - Every effort will be made to treat the complainant's identity with appropriate regard for confidentiality.

Anonymous Allegations - This policy encourages employees to put their names on allegations because appropriate follow-up questions and investigation may not be possible unless the source of the information is identified. Concerns expressed anonymously will be explored appropriately, but consideration will be given to:

- the seriousness of the issued raised;
- the credibility of the concern; and
- the likelihood of confirming the allegation from attributable sources.

Bad Faith Allegations - Allegations made in bad faith may result in disciplinary actions.

Procedure: Process for raising a concern

Reporting - The whistleblowing procedure is intended to be used for serious and sensitive issues. Such concerns may be reported to:

- your immediate supervisor
- Village Clerk
- Any Board member
- Mayor
- Code Enforcement staff

Timing - The earlier a concern is expressed, the easier it is to take action.

Evidence - Although the employee is not expected to prove the truth of an allegation, the employee should be able to demonstrate to the person being contacted that the report is being made in good faith.

Procedure: How the report of a concern will be handled

The action taken by the Village in response to a report of a concern under this policy will depend on the nature of the concern. The Board of Trustees shall receive information on each report of concern and follow-up information on actions taken.

Initial Inquiries - Initial inquiries will be made to determine whether an investigation is appropriate, and the form that it should take. Some concerns may be resolved without the need for investigation.

Further Information - The amount of contact between the complainant and the person(s) investigating the concern will depend on the nature of the issue and the clarity of information provided. Further information may be sought from or provided to the person reporting the concern.

Adopted: May 11, 2010