



DAYS END FARM HORSE RESCUE, INC.

Whistleblower Policy

Approved by the Board: October 21, 2017

INTRODUCTION

This document establishes whistleblower policies for Days End Farm Horse Rescue, Inc. (DEFHR). The management team, Board of Directors (Board) and staff of DEFHR holds themselves to high standards of business and personal ethics in the conduct of their duties and responsibilities. As representatives of DEFHR, they must practice honesty and integrity in fulfilling their responsibilities and they must comply with all applicable laws and regulations. This expectation also extends to all supporters of DEFHR, including those who give through monetary and volunteer contributions. Violations of these standards should be permitted to be safely and confidentially reported by any individual.

PURPOSE

It is the responsibility of all board members, officers, employees, donors and volunteers (together, “stakeholders”) to report concerns about unethical conduct or suspected violations of law or regulations that govern DEFHR’s operations. All stakeholders are strongly encouraged, on a regular basis, to provide feedback and raise any concerns regarding their experience so that the appropriate persons can address and correct inappropriate conduct or actions. DEFHR endeavors to ensure a supportive environment where stakeholders can seek advice on, or make a disclosure about, credible wrongdoing without fear of retaliation.

REPORTING

DEFHR has an open door policy and suggests that stakeholders share their feedback, such as compliments, questions, concerns, suggestions or complaints, with appropriate authoritative staff, management or Board members of the organization. Employees should report all feedback to their immediate supervisors or, if they are uncomfortable speaking to that individual, they may speak confidentially with the CEO or a member of the Executive Committee of the Board. Other stakeholders should report all feedback to DEFHR management or a member of the Executive Committee of the Board.

Supervisors and managers are required to report any feedback received that constitutes a complaint or concern about suspected ethical and legal violations in writing to the CEO or the Executive Committee of the Board. The CEO is then required to convey these items to the Executive Committee of the Board. All reports will be promptly investigated and appropriate corrective action will be taken if warranted following the investigation.

RESPONSIBILITY OF THE EXECUTIVE COMMITTEE

DEFHR’s Executive Committee of the Board is responsible for ensuring that all reports of alleged unethical or illegal conduct are appropriately investigated and resolved. The Executive Committee will advise the CEO and the Board of all complaints and their

resolution. If appropriate, the Board Chair will assign tasks to Board committees whose work is associated with the report received. For example, compliance activity relating to accounting or alleged financial improprieties will be conveyed to the Finance Committee.

WHISTLEBLOWER GUIDELINES

Acting in Good Faith

Anyone filing a written report 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 and may result in remedial action.

No Retaliation

It is contrary to the values of DEFHR for anyone to retaliate against any stakeholder who, in good faith, reports an ethics violation, or a suspected violation of law. Any person who retaliates against a stakeholder who has reported a violation in good faith is subject to appropriate disciplinary action, up to and including termination of employment or volunteer activity.

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.

Handling of Anonymous Complaints

Any report made anonymously will be acted on only after all of the following factors have been assessed:

- The seriousness of the matter reported;
- The extent to which the allegation contains specific details (e.g., it is clear what is being alleged, dates, times, locations, consequences of wrongdoing, names of witnesses);
- The extent to which the allegation is based on reliable information; and
- Whether the language used is abusive or otherwise suggests a poison-pen letter.

If the CEO or Executive Committee of the Board has no way of contacting the person making the allegation, all pertinent information necessary to investigate and take further action on the matter must be made available to them by the person who originally received the anonymous allegation.

Those who make allegations should be aware that:

- If deemed appropriate, the matter may be handed over to the police or other authorities for their views or with a request to investigate the allegations.

- Any false, carelessly prepared or malicious allegations received will be viewed very seriously.
- Inaccurate or negligent accusations by an employee are considered a matter of gross misconduct.
- People accused or implicated in alleged wrongdoing may be provided with a summary of the allegation(s).
- We are obliged to support employees named in anonymous allegations until such time as there may be sufficient evidence to conclude that the individual engaged in inappropriate conduct.
- A complaint that is found to have used a misleading sender name or address is very likely to be dismissed as malicious.

ANNUAL STATEMENTS

Each Board member, and any appropriate interested parties as designated by the Board, shall annually sign a statement which affirms such person:

1. Has received a copy of this policy
2. Has read and understands this policy
3. Has agreed to comply with this policy