



MENLO.CHURCH

MENLO PARK PRESBYTERIAN CHURCH

Resolution of the Board of Directors Whistleblower Policy April 14, 2015

Policy on Suspected Misconduct, Dishonesty, Fraud, and Whistleblower Protection

Menlo Park Presbyterian Church (MPPC and also known as Menlo Church) is committed to the highest possible standards of ethical, moral, and legal conduct. Consistent with this commitment, this policy aims to provide an avenue for employees to raise concerns about suspected misconduct, dishonesty, and fraud and to provide reassurance that they will be protected from reprisals or victimization for whistleblowing in good faith.

PROCEDURE

Reporting

Employees and any other person who has a concern relating to suspected misconduct, dishonesty or fraud may make a report. MPPC wants to hear of possible problems in these areas.

Concerns or suspected misconduct, dishonesty, or fraud may be reported by telephone, email or regular mail, at the employee's or reporter's preference to a member of the Central Leadership Team (CLT).

If the matter is concerning a member of the CLT, an employee can email directly the Chairman of the Compensation Committee (Chairman).

Timing

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

Investigating the Concern

Following the receipt of any complaints submitted, the CLT or Chairman will investigate each matter so reported and take corrective and disciplinary actions where appropriate. The CLT must notify the Chair of Session of the complaint immediately after it is reported.

The CLT or Chairman may enlist Ethical Misconduct Committee (as defined in the Policies and Procedures on Ethical Misconduct policy) members, employees of the ministry and/or outside legal, accounting, or other advisors, as appropriate, to conduct any investigations of complaints regarding financial dishonesty, or fraud. In conducting any investigation, the CLT or Chairman shall use reasonable efforts to protect the confidentiality and anonymity of the complainant.

Further Information

The amount of contact between the complainant and the body investigating the concern will depend on the nature of the issue and the clarity of information provided. Further information may be sought from the complainant.

Report to Complainant

The complainant will be given the opportunity to receive follow-up on their concern within two-weeks:

- Acknowledging that the concern was received;
- Indicating how the matter will be dealt with;
- Giving an estimate of the time that it will take for a final response;
- Telling the complainant whether initial inquiries have been made; and
- Telling the complainant whether further investigations will follow, and if not, why.

Information

Subject to legal constraints, the complainant will receive information about the outcome of any investigations.

Document Retention

The Compensation Committee shall retain as a part of the records of the Committee any such complaints or concerns for a period of at least seven years.

SAFEGUARDS

No Retaliation

No director, officer, or employee or other person who in good faith reports a violation shall suffer harassment, retaliation, or adverse employment consequences. An employee who retaliates against someone who has reported a violation in good faith is subject to discipline, up to and including termination of employment. This policy is intended to encourage and enable employees and others to raise concerns within the ministry prior to seeking resolution outside the ministry.

Additionally, no employee shall be adversely affected because they refuse to carry out a directive which, in fact, constitutes corporate fraud, or is a violation of state and federal law.

Confidentiality

Violations or suspected violations may be submitted on a confidential basis by the complainant or may be submitted anonymously. Reports of violations or suspected violations will be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation. Every effort will be made to protect the complainant's identity.

Anonymous Allegations

Employees are encouraged to put their names to 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 investigated, but consideration will be given to:

The seriousness of the issue raised;

- The credibility of the concern; and
- The likelihood of confirming the allegation from attributable sources.

Acting in Good Faith

Anyone filing a complaint must be acting in good faith and have reasonable grounds for believing the information disclosed indicates misconduct, dishonesty, or fraud. Any allegations that prove not to be substantiated and which prove to have been made maliciously or knowingly false will be viewed as a serious disciplinary offense.

DEFINITION OF TERMS

For purposes of this policy, the definition of “misconduct, dishonesty, and fraud” includes but is not limited to

- acts which are inconsistent with ministry policy,
- theft or other misappropriation of ministry assets,
- misstatements or other irregularities in ministry records,
- incorrect financial reporting,
- misuse of ministry resources,
- illegal activities,
- immoral or unbiblical activities,
- forgery or alteration of documents, and
- any other form of fraud.

MPPC reserves the right to modify or amend this policy at any time as it may deem necessary.

IN WITNESS WHEREOF, I have executed my name as Secretary, this 14th day of April, 2015.

Secretary