

## Riverside Church of the City of New York

### WHISTLEBLOWER POLICY

- I. **General.** Riverside Church of the City of New York (the “Church”) requires directors, officers, and volunteers to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. As representatives of the Church, we must practice honesty and integrity in fulfilling our responsibilities and comply with all applicable laws and regulations. This policy applies to directors, officers and volunteers. The policy applicable to employees is part of the Church’s Employee Handbook.
- II. **Reporting Responsibility.** It is the responsibility of all directors, officers, and volunteers to comply with the Church’s policies and all applicable laws and regulations and to report violations or suspected violations in accordance with this Whistleblower Policy.
- III. **No Retaliation.** No director, officer, or volunteer who in good faith reports any action or suspected action taken by or within the Church that is illegal, fraudulent, or in violation of any adopted policy of the Church shall suffer intimidation, harassment, discrimination, retaliation or adverse employment consequences. Anyone who retaliates against someone who has reported an alleged violation in good faith is subject to discipline up to and including removal from their position. This Whistleblower Policy is intended to encourage and enable officers, directors, and volunteers to raise concerns about potential illegal activity or violation of organizational policies within the Church prior to seeking resolution outside of the Church.
- IV. **Reporting Alleged Violations.** In most cases, volunteer should report suspected violations of the Church’s policies or potential illegal activities to his or her supervisor. If the volunteer is not comfortable speaking with his/her supervisor or is not satisfied with his/her supervisor’s response, he/she is encouraged to speak with the Senior Minister. Supervisors are required to report suspected violations of the Church’s policies or the law to the Senior Minister or Council Chairperson of the Church. Officers and directors should report suspected violations of the Church’s policies or potential illegal activities to the Senior Minister or Council Chairperson. A submitted report will be investigated by the Council or a committee thereof, with assistance from the Senior Minister or Council Chairperson A report of the findings will be submitted to the full Council with recommendations for action.
- V. **Acting in Good Faith.** Anyone filing a complaint concerning a violation or suspected violation of any law or Church policy must be acting in good faith and have reasonable grounds for believing the information disclosed indicates such a violation. The Church will view making a malicious allegation or an allegation known to be false as a serious disciplinary offense.

- VI. Confidentiality.** Violations or suspected violations may be submitted confidentially or anonymously. Because it is not possible to obtain further details from an anonymous whistleblower, anonymous complaints must contain specific, verifiable facts capable of investigation, such as dates, times, names of persons involved, and a description of the alleged wrongdoing. The Church is under no obligation to investigate vague anonymous complaints that do not provide adequate information on which to base an investigation. Any person responsible for receiving and/or investigating complaints in which the whistleblower has identified him or herself shall keep the identity of the whistleblower confidential by, at a minimum, (1) refraining from disclosing the identity of the whistleblower without the individual's explicit consent; (2) storing any information related to whistleblowers, allegations, and investigations in a secure location; and (3) limiting the number of people with access to confidential information to the minimum number possible under the circumstances.
- VII. Handling of Reported Violations.** A person who receives an official complaint, as outlined in this policy, will notify the whistleblower in writing within a reasonable time to 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. With permission of the Church Council, outside legal counsel may be consulted as needed or warranted by the complaint. Any person who is the subject of a whistleblower complaint may not be present at or participate in Council or committee deliberations or vote on the matter relating to such complaint, provided that the Council or committee may request that the person who is subject to the complaint present information as background or answer questions at a committee or Council meeting prior to the commencement of deliberations or voting relating thereto.
- VIII. Policy Administrator.** The Church has designated the Senior Minister to administer the Whistleblower Policy and to report to the Council and ensure the policy is distributed to all directors, officers, and volunteers providing substantial services to the Church; posted on the Church's website; or posted in a conspicuous location accessible by officers, directors and volunteers at the Church's offices.