

## **GLOCESTER LAND TRUST WHISTLEBLOWER POLICY**

The Gloucester Land Trust (“the GLT”) requires trustees, officers, advisors and employees to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. We are committed to operating in furtherance of our tax-exempt purposes and in compliance with all applicable laws, rules and regulations, including those concerning accounting and auditing.

### **DEFINITIONS**

**Whistleblower:** an individual who (a) reports an activity that he/she considers to be illegal or dishonest in accordance with this policy, and/or (b) participates in good faith in any investigation or proceeding resulting from a report of the nature described in (a) above.

**Illegal or Dishonest Activities:** violations of federal, state or local laws; willful misuse of funds and fraudulent financial reporting.

### **PRACTICE/PROCEDURE:**

- A. If an individual has knowledge of or a reasonable concern of illegal, dishonest or fraudulent activity, the individual is to contact the Board of Trustees through its Chairman.
- B. All reports of illegal and dishonest activities will be promptly investigated by the Executive Committee, with documentation kept of such investigation. The whistleblower is not responsible for investigating the activity or for determining fault or corrective measures. This policy applies to any matter that is related to the conduct of GLT’s activities and does not relate to private acts of an individual not connected to such activities.
- C. Whistleblower protections are provided in two important areas – confidentiality and against retaliation. Insofar as possible, the confidentiality of the whistleblower will be maintained. However, identity may have to be disclosed to conduct a thorough investigation, to comply with the law and/or to provide accused individuals their legal rights of defense.
- D. The GLT will not retaliate against a whistleblower. The right of protection against retaliation does not include immunity for any personal wrongdoing that is alleged and investigated, including, without limitation, intentionally filing a false report of wrongdoing.