Nashua River Watershed Association
WHISTLEBLOWER POLICY

The Nashua River Watershed Association (NRWA) expects its employees to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. Employees and representatives of the organization must practice honesty and integrity in fulfilling their responsibilities and comply with all applicable laws and regulations.

The NRWA Board of Directors adopted this Whistleblower Policy on March 12, 2009.

Reporting Responsibility

Each employee of the NRWA has an obligation to report in accordance with this Whistleblower Policy any suspected illegal activity engaged in by any NRWA employee, director, or contractor (hereinafter collectively referred to as “Concerns”).

No Retaliation

This Whistleblower Policy is intended to encourage and enable employees to raise Concerns within the NRWA for investigation and appropriate action. With this goal in mind, no employee who, in good faith, reports a Concern shall be subject to retaliation or adverse employment consequences. Moreover, an employee who retaliates against someone who has reported a Concern in good faith is subject to discipline up to and including termination of employment.

Reporting Concerns

Employees are encouraged to discuss Concerns with the Executive Director or a member of the Board of Directors prior to submitting a formal report. A formal report under this policy must be made in writing, but may be made anonymously. The individual should report the Concern to either the Executive Director of the NRWA or a member of the Board of Directors, or both.

Handling of Reported Violations

All reported Concerns will be forwarded to the Executive Committee of the Board of Directors in accordance with the procedures set forth herein. The Executive Committee shall be responsible for investigating, and making appropriate recommendations to the Board of Directors, with respect to all reported Concerns.
The Executive Committee will promptly investigate all reports, and appropriate corrective action will be recommended to the Board of Directors, if warranted by the investigation. In addition, action taken must include a conclusion and/or follow-up with the complainant (if the Concern is not reported anonymously) for complete closure of the Concern.

The Executive Committee has the authority to retain outside legal counsel, accountants, or any other resource deemed necessary to conduct a full and complete investigation of the allegations.

**Acting in Good Faith**

Anyone reporting a Concern must act in good faith and have reasonable grounds for believing the information disclosed indicates an improper accounting or auditing practice, or violations. The act of making allegations that prove to be unsubstantiated, and that prove to have been made maliciously, recklessly, or with the foreknowledge that the allegations are false, will be viewed as a serious disciplinary offense and may result in discipline, up to and including termination of employment. Such conduct may also give rise to other actions, including civil lawsuits.

**Confidentiality**

Reports of Concerns, and investigation pertaining thereto, shall be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation.

Disclosure of reports of Concerns to individuals not involved in the investigation will be viewed as a serious disciplinary offense and may result in discipline, up to and including termination of employment. Such conduct may also give rise to other actions, including civil lawsuits.

This policy is to be signed by all employees and members of the Board of Directors.

I have read and understand the NRWA’s Whistleblower Policy

Name: ___________________________

Signature: _________________________

Date: _____________________________

NRWA “Whistleblower” Policy as Adopted 3-12-09. Two Pages Total.