

WHISTLEBLOWER POLICY

GIVING CHILDREN HOPE

PURPOSE

Giving Children Hope ("GCHope" or "Organization") requires its directors, officers, employees and volunteers to observe high standards of business and personal ethics in performing their duties and responsibilities. The purpose of this policy is to provide a mechanism for the reporting of any suspected action that is illegal, fraudulent or in violation of any adopted policy of GCHope ("Violation") while protecting those who make those reports from retaliation. The Whistleblower Policy is intended to encourage and enable employees and others to raise serious concerns within the organization prior to seeking resolution outside the organization. This policy applies to any matter which is related to GCHope's business and does not relate to private acts of an individual not connected to the business of GCHope.

REPORTING IN GOOD FAITH

Anyone reporting a Violation must act in good faith, without malice to GCHope or any individual in the organization, and have reasonable grounds for believing that the information shared in the report is true. Any allegations that are proven to have been made maliciously or knowingly false will be viewed as a serious disciplinary offense.

NO RETALIATION

No director, officer, employee or volunteer who in good faith reports a Violation or cooperates in the investigation of a Violation shall suffer harassment, retaliation or adverse employment or volunteer consequences. Any director, officer, employee or volunteer who retaliates against another individual who in good faith has reported a Violation or has cooperated in the investigation of a Violation is subject to discipline, including termination of employment or volunteer status.

Any individual who reasonably believes he or she has been retaliated against in violation of this policy shall follow the same procedures as for filing a complaint.

REPORTING PROCESS

If an individual reasonably believes that a Violation has occurred, the individual is encouraged to share his or her questions, concerns, suggestions or complaints with any person within the organization who may be able to address them properly.

In most cases, the direct supervisor of an individual is the person best suited to address a concern. However, if an individual is not comfortable with this or is not satisfied with the supervisor's response, the individual is encouraged to report directly to the Compliance Officer, which is the HR manager or anyone in management he or she feels comfortable approaching including the Audit Committee chair or Chairman of the Board.

All supervisors and managers are required to report suspected violations to the organization's Compliance Officer.

Reports may be made by filling out a reporting form (attached) and delivering the form in an envelope to the Director of Administration's mail box addressed to the Compliance Officer, in person, by telephone or email.

CONFIDENTIALITY

Violations or suspected violations may be submitted on a confidential basis by the complainant or may be made anonymously. Reports will be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation, to comply with all applicable laws, and to cooperate with law enforcement authorities.

COMPLIANCE OFFICER; HANDLING REPORTED VIOLATIONS

The organization's Compliance Officer is responsible for investigating and resolving all reported complaints and allegations and at his or her discretion, shall advise the ED and or the audit committee. The supervisor, manager or board member who receives a report of a Violation from the complainant is required to notify the Compliance Officer of that report, except as provided below with respect to a report relating to the Compliance Officer. The Compliance Officer will notify the complainant and acknowledge receipt of a report of Violation within ten business days, but only to the extent that the complainant's identity is disclosed or a return address is provided.

If no further action or investigation is to follow, an explanation for the decision will be given to the complainant.

In the event the Compliance Officer is suspected of having committed a Violation, then the Violation will be reported to the ED and the Violation will be investigated by the Audit Committee chair under close supervision of the Board of Directors.

Compliance Officer: Director of Administration
 8332 Commonwealth Ave., Buena Park, CA 90621

ACCOUNTING AND AUDITING MATTERS; REPORTS

The Audit Committee is responsible for addressing all reported concerns or complaints of Violations relating to corporate accounting practices, internal controls or auditing. The Compliance Officer must immediately notify the Audit Committee Chair of any such concern or complaints and advise the ED on the current status of any investigation and conclusion of the investigation.

My signature below indicates my receipt and understanding of this policy. I also verify that I have been provided with the opportunity to ask questions about the policy.

Name

Signature

Date

GIVING CHILDREN HOPE
WHISTLEBLOWER REPORTING FORM

The purpose of this form is to provide a safe mechanism for reporting of any suspected illegal, fraudulent or unethical action or any action in violation of an adopted policy within the Second Harvest Food Bank of Orange County organization. Anyone reporting a violation must act in good faith, without malice and have reasonable grounds for believing that a violation occurred.

Is this the first time you are filing a report for the improper conduct?

Yes

No, please state the date(s) or approximate date(s) of your previous report(s). _____

Name of Person Filing Report

You are not required to provide your name and may remain anonymous. If you provide your name, confidentiality will be maintained whenever possible.

Name

Date

Name of Person(s) Subject to this Complaint

Name

Position

If this person is not an employee please list his or her position or relationship to the organization

Complaint Report

Please include as much detail as possible to enable a thorough investigation.

What act occurred and how do you believe it was fraudulent, illegal, or inappropriate? Please describe the nature of any injury or damage sustained, if any.

When and where did the action occur?

Are you aware of any motives for the misconduct?

Does the misconduct involve the participation of people external to the organization?

Are there any witnesses that can confirm the misconduct?

EVIDENCE: Please attach a copy of any supporting documents or evidence in your possession that may help the investigation of this matter. **DO NOT ATTEMPT TO OBTAIN** more. You are a reporting party and not an investigator of the misconduct.
