

# THE FAMILY PANTRY OF CAPE COD

## Complaint and Anti-Retaliation Policy

**A. Introduction:** The Family Pantry of Cape Cod (the “Pantry”) requires trustees, directors, officers, employees and volunteers to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. Representatives of the Pantry must practice honesty and integrity in fulfilling their responsibilities and must comply with all applicable laws and regulations.

**B. Policy:** This policy is intended to encourage and enable those associated with the Pantry to raise serious concerns internally so that the Pantry can address and correct inappropriate conduct and actions. It is the responsibility of all trustees, board members, officers, employees and volunteers to report concerns about possible ethical violations or suspected violations of law or regulations that govern the Pantry’s operations.

**C. No Retaliation:** It is contrary to the values of the Pantry for anyone to retaliate against any trustee, board member, officer, and employee or volunteer who in good faith reports an ethics violation, or a suspected violation of law, such as a complaint of discrimination, or suspected fraud, or suspected violation of any regulation governing the operations of the Pantry. An employee who retaliates against someone who has reported a violation in good faith is subject to discipline up to and including termination or dismissal.

**D. Reporting Procedure:** The Pantry has an open door policy and suggests that those who have questions, concerns, suggestions or complaints make them known initially to their supervisor. If a person is not comfortable in speaking with a supervisor, or is not satisfied with a supervisor’s response, the person making the report is encouraged to speak with the Executive Director. Supervisors are required to report complaints or concerns about suspected ethical and legal violations in writing to the Executive Director, who has the responsibility to investigate all reported complaints. Persons with concerns or complaints may also submit their concerns in writing directly to the Executive Director. If the complaint concerns the executive director, it will be submitted to the Chairman of the Board of Directors.

**E. Executive Director’s Action:** The Executive Director is responsible for ensuring that all complaints about unethical or illegal conduct are investigated and resolved. The Executive Director will advise the Board of Directors of all complaints and their resolution.

**F. Accounting and Auditing Matters:** The Executive Director shall immediately notify the Finance Committee of any concerns or complaints regarding accounting practices, internal controls, and financial matters or auditing and shall work with the committee until the matter is resolved.

**G. Good Faith:** Anyone making an oral or written complaint concerning a violation or a suspected violation must be acting in good faith and have reasonable grounds to believe that the information disclosed constitutes a violation. Any allegations that have been made maliciously or knowingly to be false will be viewed as a serious offense which may warrant discipline.

**H. Confidentiality:** Violations or suspected violations may be submitted on a confidential basis by the complainant. Reports of violations or suspected violations will be kept confidential to the extent possible, consistent with the need to conduct an investigation.

**I. Handling of Reported Violations:** The Executive Director will notify the person who submitted a complaint of the result of any investigation and the action taken, if any.

**J. Amendment and Modification:** This Policy may be amended or modified at any time by a majority vote of the Board of Directors.

Adoption and Amendment History:

This Policy adopted on May 26, 2017 by the Board of Directors