



## **Southborough Open Land Foundation**

### **Whistleblower Policy**

#### **1. Purpose**

This Whistleblower Policy is intended to encourage and enable board members, volunteers, and contractors of the **Southborough Open Land Foundation** (Organization) to raise serious concerns internally so that the Organization can address and correct inappropriate conduct and actions. It is the responsibility of all board members, volunteers, and direct and contract employees to report concerns about suspected violations of law or ethical standards that affect the Organization.

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#### **2. Policy Statement**

The Organization is committed to the highest standards of integrity, transparency, and accountability. No person who in good faith reports a concern shall suffer harassment, retaliation, or adverse consequence. Anyone retaliating against a whistleblower will be subject to appropriate disciplinary action.

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#### **3. Scope**

This policy applies to:

- Members of the Board of Trustees
- Volunteers working on behalf of the Organization
- The Organization's direct and contract employees

It covers suspected misconduct such as:

- Violations of federal, state, or local laws or regulations
  - Misuse or mismanagement of organizational funds or assets
  - Fraud, waste, or abuse
  - Unsafe or unethical practices
  - Conflicts of interest or self-dealing
  - Retaliation against anyone reporting a concern in good faith
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#### **4. Reporting Procedures**

1. **Initial Reporting:**

Concerns should be reported promptly to the **Board President**.

If the concern involves the Board President, it should be reported to the **Vice President** or another officer of the Board.

2. **Method of Reporting:**

Reports may be made in writing, by email, or verbally. Anonymous reports will be accepted, though sufficient detail must be provided to allow for an appropriate investigation.

3. **Good Faith Requirement:**

Anyone filing a complaint must act in good faith and have reasonable grounds for believing the information disclosed indicates a violation.

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#### **5. Investigation and Resolution**

- The officer receiving the report will ensure it is reviewed promptly.
  - The Board may appoint a small ad hoc committee (of members not involved in the matter) to investigate.
  - All reports and investigations will be handled confidentially to the extent possible, consistent with the need to conduct a fair and thorough inquiry.
  - Findings and any recommended actions will be reported to the full Board for appropriate resolution.
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#### **6. No Retaliation**

No one who reports a concern in good faith shall be subject to retaliation, harassment, or adverse consequences. Any act of retaliation should be reported immediately to the Board President (or another officer if the President is involved) and will result in corrective action, up to removal from the Board or termination of a contract.

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#### **7. Documentation**

All reports, investigation notes, and conclusions will be documented and maintained in the Organization's confidential records by the Secretary or another designated officer for a minimum of five years.

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## **8. Annual Review**

The Board of Trustees shall review this policy every five years and make updates as needed to ensure compliance with applicable laws and nonprofit best practices.

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**Approved by the Board of Trustees on:** 10 December 2025

**Signature, Board President:** Destin Heilman

**Signature, Secretary:** Eileen Samberg