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# CIVICOS INSTITUTE

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GOVERNANCE DOCUMENT

## Whistleblower Policy

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**Document ID:** o8

**Version:** 1.0

**Status:** DRAFT — Pending Board Adoption

**Contact:** NCerbone@civicos-institute.org

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## 1. Purpose

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Protect good-faith reporting and prohibit retaliation.

## 2. Scope

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Applies to directors, officers, employees, contractors, and volunteers.

## 3. Good-Faith Standard

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Reports must be honest and made in good faith.

## 4. Reporting Channels

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Anonymous channel: whistleblower@civicos-institute.org routed to Board Chair and one designated independent director.

## 5. Non-Retaliation

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Retaliation is prohibited and treated as a separate violation.

## 6. Intake Acknowledgment

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Anonymous reports will be logged and reviewed but may not receive acknowledgment where no contact information is available.

## 7. Investigation Process

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### 7.3 Timeliness

No investigation shall exceed ninety (90) calendar days without mandatory written notification to the Board Chair stating reason for delay and estimated completion date.

## 8. Corrective Actions

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Corrective action and remediation are documented and tracked.

## 9. Confidentiality

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Confidentiality maintained to the extent practicable and lawful.

## 10. Records Retention

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Records managed under retention policy and legal hold requirements.

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## 11. Board Oversight

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No less than annually, at or before the fiscal year-end Board meeting.

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## 12. Special Cases

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### 12(a) Board member misconduct track

Where substantiated against a sitting Board member, corrective action follows Bylaws Article III Section 3.05 with subject member recusal from deliberation and voting.

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## 13. Non-Waiver

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No waiver outside formal board action.

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## 14. Adoption and Review

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Policy owner and review cadence documented by board governance process.

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## Adoption and Signatures

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**Board Chair:** \_\_\_\_\_

**Date:** \_\_\_\_\_

**Executive Director:** \_\_\_\_\_

**Date:** \_\_\_\_\_