

# **Policy on Reporting Inappropriate Financial Management/ Whistleblower Complaints**

## **Background**

The Sarbanes-Oxley act requires all corporate entities to establish a confidential and anonymous mechanism to encourage employees to report any inappropriateness within the entity's financial management. This requirement relates to all corporate entities, not just publicly traded companies, and therefore it is applicable to Foodshare.

## **Policy**

Foodshare will communicate to all employees that anyone with a reasonable belief or suspicion that inappropriate financial practices are occurring should directly contact the Treasurer. Alternatively, employees may also contact the Board of Directors Chair. The reporting employees do not need to identify themselves to the Treasurer or Chair, and the identity, if provided, will be kept confidential to the extent possible. Employee complaints made through this mechanism should be limited to those that relate to the financial activities of Foodshare only.

Anyone making a complaint must be acting in good faith and have reasonable grounds for believing that inappropriate conduct has occurred. Allegations which prove to have been made maliciously or to be knowingly false will be viewed as a serious disciplinary offense.

It is prohibited for Foodshare to retaliate against employees (including, but not limited to, firing, demotion, suspension or non-consideration for promotion), or to discriminate against them in any other manner, for reports made in good faith.

## **Process for Complaint Handling**

The Treasurer or Chair will notify the Audit Committee of any report, and the Audit Committee will promptly conduct an analysis of the complaint (within 30 days, if possible). Based on the outcome of the analysis, the Audit Committee may conduct a full investigation. In the event a complaint involves a Director or an officer of Foodshare, an independent investigation will be conducted. When the investigation is complete, the Audit Committee will oversee the creation and implementation of a Corrective Action Plan to resolve the complaint. Foodshares will report the status and/or results of its investigation to interested parties, as appropriate.

Additional information about how whistleblower complaints are handled can be found in the Procedures for Handling Whistleblower Complaints.

This policy shall be verbally reviewed at least annually at a Foodshare staff meeting and will be posted in a visible location so that employees may readily see it.

## **Review of Policy**

The Audit Committee will review this policy annually. Any recommended changes will be forwarded to the Governance and Nominating Committee for consideration. .

## **Contact Information**

Foodshare's Treasurer is currently John Hackendorn, who may be contacted at his work phone, (860) 273-5294, or by e-mail to [HackendornJ1@aetna.com](mailto:HackendornJ1@aetna.com) or by mail to 15 Hop Brook Rd, Simsbury, CT 06070.

The Chair of the Board of Directors is currently Leslie Soler, who may be contacted at her work phone, (860) 547-2939, or by e-mail to [Leslie.Soler@thehartford.com](mailto:Leslie.Soler@thehartford.com) or by mail to 2 White Oak Road, Farmington, CT 06032.