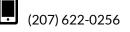


PO Box 18187 Portland ME 04112



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WHISTLEBLOWER POLICY

07/30/2022 — Adopted by LWVME, LWVME Education Fund and MCCE

The League of Women Voters of Maine (LWVME), LWVME Education Fund, Maine Citizens for Clean Elections (MCCE), and MCCE Action (collectively referred to as 'the organizations') require Board members, officers, employees, contractors, and volunteers to observe high standards of professional and personal ethics in the conduct of their duties and responsibilities. As representatives and stakeholders of the organizations, we practice honesty and integrity in fulfilling our responsibilities and comply with all internal policies and applicable laws and regulations.

POLICY

It is the policy of the organizations to act ethically in all matters and to abide by all applicable federal, state and local laws, rules and regulations as well as the policies of the organizations, and the League of Women Voters of the United States, and to require its employees, contractors, and volunteers to do the same. This policy is intended to encourage employees, volunteers, and others to feel safe to raise serious concerns internally so that significant problems may be reviewed and addressed.

PROCEDURE

It is the policy of the organizations to encourage open communication on all matters as a means of ensuring the safety and well-being of all stakeholders. Open communication also helps ensure compliance with applicable laws and regulations and with our own policies. Accordingly, an employee or volunteer will be protected from discrimination and

retaliation if the person reports to the Executive Director or the Board President any good faith concern regarding any occurrence, practice, or condition which the person has reasonable cause to believe is in violation of any policy or federal, state or local law, rules or regulation, or which the employee has reasonable cause to believe risks the health, safety, or well-being of that employee or any other individual, or which creates a hostile or unsafe workplace. Upon receipt of credible information, the Board or a subcommittee thereof will promptly investigate each complaint to determine its merits and the appropriate action to be taken. Violations or suspected violations may be submitted on a confidential basis by the complainant, recognizing that in some circumstances the complainant's request for confidentiality may limit the ability to conduct a full review. If an investigation reveals unlawful conduct or conduct that constitutes a serious violation, appropriate disciplinary action will be taken, up to and including suspension, discharge, or separation.

If, for any reason, the person making the complaint has reason to believe that there may be a conflict of interest for both the Executive Director and the Board President the person may report their complaint to an alternative Board member.

Following a determination on the merits as set forth above, a person making a complaint may have the right to appeal. In the event of an appeal, the Board shall appoint a special appeal committee of three members to review the decision.

The organizations will not discharge, demote, reduce the compensation, threaten, discriminate against, or otherwise retaliate against a person who submits a good faith complaint under this policy, participates in any investigation or legal proceeding arising from any such complaint, or who takes any other lawful actions relating to reporting real or perceived unlawful conduct, even if an investigation proves that there had been no violation of policy or unlawful activity involving the organizations or any of their employees, contractors, or volunteers.

Any person covered by this policy may also have the right to bring a complaint with a governmental entity or in a governmental forum under state or federal law. In order to receive the protection of those laws, a person may be required to make an initial internal report pursuant to this policy unless the person has specific reason to believe that an internal report will not result in a prompt correction of the violation, condition, or practice.

Useful Links: Board Members Board Policies If any employee or volunteer believes that an action taken against them is discriminatory or retaliatory, that person should report the matter immediately to the Executive Director or the Board President. The organizations will not tolerate discrimination or retaliation against a complainant. Any employee or volunteer who discriminates against or retaliates against a complainant will be subject to discipline, up to and including suspension or discharge from employment or separation from the organization. Employees and volunteers who are not themselves complainants, but who assist in an investigation relating to possible violations of law or internal policy, are also protected from discrimination and retaliation.

RESPONSIBILITY

The administration of this policy is the responsibility of the Boards of Directors, which may delegate administrative roles to a Board Committee, individual Board members, or the Executive Director.