

Standard 2: Compliance with Laws

WHISTLEBLOWER PROTECTION POLICY

Purpose

Utah Open Lands [UOL] is committed to lawful and ethical behavior in all of its activities. As such, UOL requires its employees to observe high standards of business and personal ethics and act with honesty and integrity when conducting their duties and responsibilities on behalf of UOL. The purpose of this Policy is to require disclosure of all illegal or unethical conduct in connection with UOL's finances or other aspects of its operations, and to describe the methods for employees to promptly alert UOL regarding these matters.

I. Reporting Required

A. What to Report

All employees of UOL must promptly report in compliance with this Policy any of the following situations of which the employee becomes aware or has reason to believe may exist:

1. violations of any applicable federal, state or local law or regulation;
2. violations of any material policy of UOL.
3. any questionable or improper matters regarding bookkeeping, accounting, internal accounting controls, or auditing matters; or
4. inappropriate handling or resolution of any complaint or matter previously reported under this Policy.

An activity is subject to reporting under this Policy regardless of whether or not such activity is within the scope of the employee's official duties on behalf of UOL.

B. How to Report

Reports under this Policy must be made to either the executive director or the chairman of the board of Directors. Additionally, at the employee's discretion and if the circumstances warrant, reports may be made directly to any UOL Board of Director. Reports may be made in a way that identifies the reporter or anonymously, at the discretion of the reporting employee.

C. Handling of Reports

Reports under this Policy will be taken seriously and investigated promptly. UOL will maintain the confidentiality of reports to the extent feasible in light of its need to investigate and take applicable corrective action. Appropriate corrective action, up to and including termination of employment, will be taken if warranted by the investigation into the reported conduct or for violations of this Policy.

II. Retaliation Prohibited

No employee may take any action that is harmful to an employee, discharge, demote, suspend, threaten, harass or in any manner discriminate against an employee in the terms and conditions of employment because of any lawful act done by the employee:

1. to report any matter that the employee reasonably believes must be reported under this Policy;

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2. to participate in an investigation by a regulatory authority, law enforcement agency, member or committee of Congress, or any person with supervisory authority over the employee or who has the authority to investigate reports under this Policy;
3. to report truthful information relating to any state or federal offense to a law enforcement officer;
4. to provide information, cause information to be provided, or otherwise assist in an investigation regarding any conduct which the employee reasonably believes constitutes a violation of applicable law or fraud, when the investigation is brought by a governmental, regulatory, or law enforcement agency, a member or committee of Congress, a person with supervisory authority over the employee, or such other person working for UOL who has the authority to investigate, discover, or terminate improper conduct.

Any employee who has reason to believe that he or she has been subject to retaliation for making a report or participating in an investigation under this Policy must immediately report such alleged retaliation in accordance with section I.A. and I.B. of this Policy. Any employee who retaliates against another employee for making a report or participating in an investigation under this Policy will be subject to disciplinary action, up to and including termination of employment.

III. Applicability to Volunteers

Although not employees of UOL, UOL expects its volunteers, to observe high standards of business and personal ethics, especially in connection with their relationship to UOL. As such, UOL expects and encourages its volunteers to report misconduct in compliance with this Policy using the procedures identified above.