

## The Pittsburgh Project Whistleblower Policy

Effective: February 19, 2022

### **Policy.**

The Pittsburgh Project's policy is that its Board members, employees, and volunteers will comply with all applicable laws and regulations and observe the highest standards of business and personal ethics in the governance, management, and operation of The Pittsburgh Project. To protect its reputation, service delivery, and financial wellbeing, The Pittsburgh Project has developed a procedure to solicit and promptly investigate any allegation of improper conduct by a Pittsburgh Project Board member, employee, or volunteer. Anyone found to have engaged in improper conduct will be subject to disciplinary action, including but not limited to suspension, termination, and possible civil and criminal sanctions.

### **Definitions.**

*Improper Conduct:* Any activity by a The Pittsburgh Project Board member, employee, or volunteer which is found, following an investigation, to violate any legal, regulatory, or Pittsburgh Project conduct policy or procedure including but not limited to activities involving corruption, self-dealing, bribery, malfeasance, theft, fraud, coercion, conversion or the misuse or misappropriation of Pittsburgh Project assets.

*Baseless Allegation:* Any written or verbal allegation of improper conduct made without reasonable cause to believe the allegation is true, including allegations not made in good faith with intent to harm or distract attention from wrongdoing. Individuals making such allegations will be subject to disciplinary action and may be subject to legal claims by individuals intentionally wrongfully accused of misbehavior.

*Protected Disclosure:* Any written or verbal good faith communication that discloses improper conduct by a The Pittsburgh Project Board member, employee, or volunteer.

### **Coverage.**

This policy covers all The Pittsburgh Project Board members, employees, and Pittsburgh Project, volunteers.

### **Duty to Disclose.**

All individuals involved in the operation of The Pittsburgh Project are required to become familiar with and abide by this Whistleblower Policy. If you suspect or become aware of improper conduct involving a The Pittsburgh Project Board member, employee, or volunteer,

**The Pittsburgh Project Designated Compliance Officers. - Investigation Protocol.**

Protected disclosures of improper conduct as defined within this policy should be communicated to the designated primary The Pittsburgh Project Compliance Officer(s). All reports submitted shall appropriately documented and acknowledged by the Compliance Officer within 48 hours.

The Pittsburgh Project's Whistleblower Compliance Officer is Rick Mason. The Pittsburgh Project's Compliance Officer can be contacted as follows:

Email: [rmason@pittsburghproject.org](mailto:rmason@pittsburghproject.org)

Phone: 412-321-1678 ext. 527

The Pittsburgh Project's Compliance Officer shall be responsible for reporting, investigating, and resolving all reported complaints and allegations concerning allegations of improper conduct by a The Pittsburgh Project employee, board member, or volunteer. The Compliance Officer shall at all times have the authority and access to The Pittsburgh Project's resources and leadership necessary to promptly and effectively respond to all allegations. As needed or appropriate, disclosures of improper conduct may also be reported to an alternate Compliance Officer who will follow the documentation and communication protocols cited above. The Pittsburgh Project's Alternate Compliance Officer is: Brian Johnson, Board Chair, and may be contacted as follows:

Email: [boardpresident@pittsburghproject.org](mailto:boardpresident@pittsburghproject.org)

Allegations of violations may be submitted on a confidential basis by a The Pittsburgh Project director, employee, or volunteer who chooses to identify themselves or may be submitted anonymously. Reports of violations or suspected violations will be kept confidential to the extent possible, subject to the need to conduct an adequate investigation, comply with applicable legal requirements, and take appropriate corrective action to address the reported improper conduct.

### **Protection for Whistleblowers**

Individuals submitting protected disclosures of improper conduct involving The Pittsburgh Project Board member, employee or volunteer will be protected from any adverse employment action or harassment for reporting their concerns. Any retaliatory action against a whistleblower for reporting in good faith is strictly prohibited, and violators will be subject to disciplinary action up to and including termination or separation from service.

### **The Requirement of Good Faith**

This Whistleblower Policy only protects individuals who report violations or suspected violations in good faith. Good faith requires a reasonable belief on the part of the reporter that improper conduct by a The Pittsburgh Project Board member, employee, or volunteer has, is, or will occur. If The Pittsburgh Project becomes aware that a whistleblower made any allegations of improper conduct that were known to be baseless at the time that they were reported or were reported with malicious intent, The Pittsburgh Project will treat such allegations as a serious offense that requires disciplinary action up to and including termination. Such false assertions may also result in legal claims by the injured party.

### **Request for Anonymity**

Any whistleblower that reports a violation or suspected violation may do so anonymously. Because the merits of anonymous reports are often difficult to assess and investigate, anonymous reports should be limited to particularly egregious situations. Any whistleblower has the option to request that their identity remain confidential. The Pittsburgh Project will honor such a request if and to the extent it concludes that it is able to complete a thorough and proper investigation of the alleged violation and comply with its legal obligations while protecting the identity of the whistleblower reporter.

### **Dissemination of Policy.**

This policy will be disseminated to all The Pittsburgh Project Board members, employees, and volunteers with documentation of receipt and will be posted in appropriate areas of the office to assure accessibility.

### **Policy Review.**

This policy will be reviewed as needed to assure compliance with applicable legal and best practice management standards as well as administration experience.