

BRANFORD ELECTRIC RAILWAY ASSOCIATION, INC.
THE SHORE LINE TROLLEY MUSEUM

POLICY NUMBER 104
GENERAL

WHISTLEBLOWER POLICY

Scope

This policy, approved by the Board of Trustees of Branford Electric Railway Association, Inc., applies to all Shore Line Trolley Museum employees and volunteers. If in the event this policy conflicts with existing law, regulation, or contractual obligation of the corporation, the Museum shall comply with said law, regulation, or obligation.

Purpose

The Shore Line Trolley Museum is committed to high standards of ethical, moral and legal business conduct. In line with this commitment, and the Museum's commitment to open communication, this policy aims to provide an avenue for employees and members to raise concerns, and reassurance that they will be protected from reprisals or victimization for whistleblowing.

This whistleblowing policy is intended to cover protections for you if you raise concerns regarding the Museum, such as concerns regarding:

- incorrect financial reporting;
- unlawful activity;
- activities that are not in line with Museum policy
- activities that otherwise amount to serious improper conduct.

Procedure:

Reporting

Complaints that are not appropriate for normal administrative channels should be reported in writing, with or without identity of the reporter, to the Chair or any member of the Board of Trustees. Verbal contact is not acceptable.

Evidence

Although the employee or volunteer is not expected to prove the truth of an allegation, the employee or volunteer needs to demonstrate that there are reasonable grounds for concern on his or her part and that these concerns are most appropriately handled through this procedure

Investigation of Complaint

After receipt of the complaint, initial inquiries by the Board will be made to determine whether an investigation is appropriate and the form that it should take. Concerns may be resolved through the initial inquiry by agreed action without the need for further investigation. The Board of Trustees will receive a report on each complaint and a follow-up report on actions taken.

Contact With and Information to Reporter

The amount of contact between the reporter and the Board will depend on the nature of the issue and the clarity of information provided. Further information may be sought from the reporter, if he or she is known. The reporter, if known, will be given the opportunity to receive follow-up on his or her concern within in two weeks. This follow-up includes:

- Acknowledgment that the concern was received;
- Indication as to how the matter will be dealt with;
- An estimate of the time that it will take for a final response

Subject to legal constraints and/or what is determined to be in the best interests of the Museum, the reporter will receive information about the outcome of any investigations.

Safeguards

- *Harassment or Victimization* - Harassment or victimization for reporting concerns under this policy will not be tolerated. In addition, the provision of such information shall not in any way influence, positively or negatively, the carrying out of routine disciplinary procedures by management as stated in the personnel policies or the personnel evaluation process or its outcomes.
- *Confidentiality* - Every effort will be made to treat the complainants identity with appropriate regard for confidentiality.
- *Anonymous Allegations* - This policy encourages employees and volunteers to put their names to allegations because appropriate follow-up questions and investigation may not be possible unless the source of the information is identified. Concerns expressed anonymously will be explored appropriately, but consideration will be given to:
 - The seriousness of the issue raised;
 - The credibility of the concern; and
 - The likelihood of confirming the allegation from attributable sources.
- *Bad Faith Allegations* - Allegations in bad faith may result in disciplinary action.

Approved by the Board of Trustees, March 10, 2012

Replaces policy "Adopted in Principle" by the Board of Trustees, October 10, 2009