

## **Ethics Policy**

*Approved by the Board on December 2, 2020*

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The Greater Milwaukee Foundation (“GMF” or the “Foundation”) is committed to maintaining the highest standard of ethical conduct as well as fair and accurate reporting of financial matters of the Foundation. The Ethics Policy reflects the practices and principles of behavior that support this commitment. The Foundation expects every employee and board member, consultant and volunteer to act in accordance with the highest ethical standards in the performance of their responsibilities for the Foundation. Ethical conduct includes, but is not limited to complying with applicable Foundation policy statements, including the Foundation’s Conflict of Interest, Human Resource and Ethics Policies, conforming to professional standards, providing full disclosure of information where appropriate, handling sensitive information in a confidential manner, not engaging in illegal activities and not engaging in any other activity that would compromise the integrity or reputation of the Greater Milwaukee Foundation.

The Foundation will investigate reports of suspected violations of this policy by employees, board members, consultants or volunteers. The Foundation will take appropriate action against anyone found to have violated this policy including corrective action by the Foundation or civil or criminal prosecution if warranted.

All members of the Foundation community are encouraged to report suspected violations of this policy (i.e. to act as a “whistleblower”) pursuant to the procedures set forth in this policy. This policy also describes steps the Foundation will take to protect those individuals who in good faith report such behavior.

### ***Definition of Terms***

Baseless Allegations: Allegations made with reckless disregard for their truth or falsity. People making such allegations may be subject to corrective action by the Foundation and/or legal claims by individuals accused of such conduct.

Fraudulent or Dishonest Conduct: A deliberate act or failure to act with the intention of obtaining an unauthorized benefit. Examples of such conduct include, but are not limited to:

- Forgery or alteration of documents
- Unauthorized alteration or manipulation of computer files
- Fraudulent financial reporting, including intentional material misrepresentation of an item included in the financial records, financial reports or audit reports of the Foundation
- Pursuit of a benefit or advantage in violation of the Foundation’s Conflict of Interest Policy
- Misappropriation or misuse of the Foundation resources, such as funds, supplies or other assets
- Authorizing or receiving compensation for goods not received or services not performed
- Authorizing or receiving compensation for hours not worked

Unethical Behavior: Actions or conduct in which one intentionally circumvents or thwarts the moral duty or obligation expected by the Foundation in serving the community and the Foundation's constituency. Examples of such conduct include, but are not limited to:

- Actions that result in noncompliance with laws and regulations that apply to the Foundation
- Failure to act upon or inform management or the Board of relevant facts that could result in noncompliance with applicable laws and regulations
- Actions that violate industry (e.g. Community Foundation standards) and professional standards (e.g. American Institute of Certified Public Accountants, Association of Fundraising Professionals); and
- Intentional noncompliance with internal controls.

Actions that Compromise the Foundation's Reputation and Integrity: Actions or conduct that do not align, or appear not to align, with the Foundation's mission and values. Examples of such conduct include, but are not limited to:

- Actions that are inconsistent with the Foundation's anti-harassment, anti-discrimination and anti-violence policies;
- Behavior that undermines the Foundation's goal of maintaining a diverse and inclusive organization;
- Actions that are contrary to the Foundation's commitment to advancing equity and economic inclusion for all individuals and reducing disparities among people of color and marginalized communities; and
- Actions that compromise the Foundation's ability to fulfill its mission.

Whistleblower: An employee, board member consultant, volunteer or community member who informs a supervisor, the Vice President, Human Resources and Organizational Learning, the President/CEO or the Admin and Audit Committee Chair directly or through the GMF Internal reporting System, about an activity relating to the Foundation which that person believes to Violate the policy.

### ***Reporting Concerns***

A person's concerns about possible violations of the policy should be reported to their supervisor or, if suspected by a volunteer, to the employee supporting the volunteer's work. If for any reason a person finds it difficult to report their concerns to a supervisor or employee supporting the volunteer's work, the person may report the concerns through GMF's Internal Reporting System.

The concerned individual should provide as many details as possible, including a description of the questionable practice or behavior, the names of any persons involved, the names of possible witnesses, dates, times, places and any other available details. The concern should be documented in detail in writing. Although the Foundation provides whistleblower protection against retaliation, an employee may feel more comfortable reporting a concern anonymously through GMF's Internal Reporting System.

### ***GMF's Internal Reporting System***

The internal reporting system is administered by Fulcrum Inquiry, an independent organization from GMF. An employee may report their concern four (4) different ways:

- Phone line at 213-212-6932, answered by professional personnel from 8:00 a.m. to 6:00 p.m. (PCT). Outside these hours, the phone will be answered by an automated voicemail system
- Web-based form located at <http://fulcrum.com/gmf>
- E-mail sent to [whistle@fulcrum.com](mailto:whistle@fulcrum.com)
- Mail addressed to Fulcrum Inquiry, Whistleblower Department, 707 Wilshire Boulevard, Suite 2050, Los Angeles, CA 90017

All reports will be forward to Human Resources and the Chair of the Admin and Audit Committee.

### ***Management Responsibilities***

Supervisors are required to report suspected violations of this policy to the Vice President, Human Resources and Organizational Learning, the President/CEO or the Admin and Audit Committee Chair. In addition, supervisors are responsible for maintaining a system of management controls to detect and deter fraudulent or dishonest conduct. A supervisor is expected to provide the appropriate degree of supervision for their employees. Failure by a supervisor to establish proper controls or report misconduct within the scope of this policy may result in adverse personnel action against the supervisor, up to and including dismissal. The Vice President, Human Resources and Organizational Learning is available to assist supervisors in establishing management systems and recognizing improper conduct.

Reasonable care should be taken in dealing with suspected misconduct to avoid:

- Baseless allegations
- Premature notice to persons suspected of misconduct and/or disclosure of suspected misconduct to others not involved with the investigation
- Violations of a person's rights under law

Due to the important yet sensitive nature of the suspected violations, effective professional follow-up is critical. Supervisors, while appropriately concerned about "getting to the bottom" of such issues, should not in any circumstances perform any investigative or other follow-up steps on their own. Accordingly, a supervisor who becomes aware of suspected misconduct should not:

- Contact the person suspected to further investigate the matter or demand restitution
- Discuss the case with attorneys, the media or anyone other than the Vice President, Human Resources and Organizational Learning or the President/CEO
- Report the case to an authorized law enforcement officer without first discussing the case with the Vice President, Human Resources and Organizational Learning, the President/CEO or Admin and Audit Committee Chair

### ***Investigation of Reported Concerns***

All relevant matters, including suspected but unproven matters, will be reviewed and evaluated. Concerns may warrant investigation by independent persons such as auditors and/or attorneys. The Admin and Audit Committee will ensure that all fraud and ethics concerns are resolved. Depending on the nature and severity of the matter, the Admin and Audit Committee may oversee the investigation and resolution of the concern, or the Committee may conduct its own investigation. The receipt, retention, investigation and treatment of the complaint will be documented. The Foundation will take prompt and appropriate corrective action in response to the complaint or concern, if necessary, to ensure compliance with legal and ethical requirements. Steps will be taken to ensure the concern is fully addressed and will not recur, including changes in Foundation policies and procedures, if necessary. Resolution of the matter will be communicated back to the reporting person and their supervisor, including whether the concern resulted in corrective action or clarification of a misunderstanding.

### ***Whistleblower Protection***

The Foundation will protect whistleblowers as described below.

- The Foundation will use its best efforts to protect whistleblowers against retaliation. Complaints will be handled with sensitivity, discretion and confidentiality to the extent allowed by the circumstances and the law. Generally, this means that whistleblower complaints will only be shared with those who have a need to know so that the Foundation can conduct an effective investigation, determine what action to take based on the results of any such investigation, and in appropriate cases, with law enforcement personnel. Should legal action be taken against a person or persons as a result of a whistleblower complaint, such persons may also have the right to know the identity of the whistleblower.
- Employees, board members consultants and volunteers of the Foundation may not retaliate against a whistleblower for informing management about an activity, which that person believes violates the policy. Retaliation would include any action with the intent or effect of adversely affecting the terms or conditions of the whistleblower's employment, including but not limited to, threats of physical harm, loss of job, punitive work assignments or impact on wages or fees.
- Whistleblowers who believe that they have been retaliated against may file a written complaint with the Vice President, Human Resources and Organizational Learning, the President/CEO or Admin and Audit Committee Chair. Any complaint of retaliation will be promptly investigated and appropriate corrective measures taken if allegations of retaliation are substantiated. This protection from retaliation is not intended to prohibit supervisors from taking action, including corrective action, in the usual scope of their duties and based on valid performance-related factors.
- Whistleblowers must be cautious to avoid baseless allegations (as described earlier in the definitions section of this policy).

Questions related to the interpretation of this policy should be directed to the employee's supervisor or the Vice President, Human Resources and Organizational Learning.

For employees of the Foundation, this policy shall not supersede current employment policies and should be interpreted and applied consistently with such policies.