

Naples Library Whistleblower Policy

Naples Library is committed to operating in an environment of honesty and integrity and in compliance with all applicable laws, rules and regulations, including those concerning accounting and auditing. The Naples Library prohibits fraudulent practices by any of its trustees, officers, employees, or volunteers and expects its trustees, officers, employees, and volunteers to conduct themselves in accordance with law, regulation, the Naples Library policy, and procedures. It hereby establishes a policy against unlawful or fraudulent conduct and outlines a procedure for employees to report actions that a trustee or employee reasonably believes violates a law or regulation, or that constitutes fraudulent accounting or other practices. This policy applies to any matter which is related to the Naples Library's business and does not relate to private acts of an individual not connected to the business of the Naples Library.

If a trustee, officer, employee, or volunteer has a reasonable belief that a trustee, officer, employee, or volunteer, or the group as a whole, has engaged in any action that: (1) violates any applicable law or regulation, including those concerning accounting and auditing, or (2) constitutes a fraudulent practice, that person is required and expected to immediately report such information to the Manager/Director. If the person does not feel comfortable reporting the information to the Manager/Director, he or she is expected to report the information to the President of the Board of Trustees or to another trustee. The person may, in addition, report the matter to a federal, state, or local agency.

All reports will be reported to the Board of Trustees, acted upon promptly, and an investigation will be conducted. The Naples Library Board President or the Manager/Director will conduct or designate other internal or external parties to conduct the investigations. The person assigned to conduct the investigation will deliver his/her findings to the Board of Trustees within twelve business days. A report summarizing the findings will be given to the individual who filed the complaint (if a name is given) within twelve business days. If more than twelve business days are needed, the individual who filed the complaint will be notified in writing, or given an estimated date the investigation will be completed (to be done no later than thirty days after the first report is made.) In conducting such investigations, the Naples Library will strive to keep the identity of the complaining individual as confidential as possible, while conducting an adequate review and investigation.

The Naples Library will not retaliate against an employee in the terms and conditions of employment because that employee: (a) reports, in good faith, to a supervisor, the Manager/Director, the Board of Trustees, or to a federal, state or local agency what the employee believes in good faith, to be a violation of the

law; or (b) participates, in good faith, in any resulting investigation or proceeding, or (c) exercises this or her rights under any state or federal law(s) or regulation(s) to pursue a claim or take legal action to protect the employee's rights. The Naples Library may take disciplinary action (up to and including termination) against an employee, officer, trustee, or volunteer who, in the Board of Trustees assessment, has engaged in retaliatory conduct in violation of this policy or has violated the provisions of this policy.

This policy may be amended by the Naples Library Board of Trustees at any time.

Adopted by the Naples Library Board of Trustees on March 24, 2015. Reviewed on March 22, 2018.

The Whistleblower Reporting Form

For the Naples Library

Your name* (see note below)

Telephone _____ Email

Name of the person you are reporting

Date of incident

Type of incident

incorrect financial reporting

unlawful activity

activities that are inconsistent with the Naples Library policies

Description of incident:

*Submit this report to the Naples Library, 118 S. Main St., Naples, N.Y. It may be sent to the Manager/Director or if this person is the person you are reporting, submit the report to the president of the Board of Trustees.

All information in this form will be kept confidential. Please review the attached Whistleblower Policy.

*NOTE: With the exception of a person's report of his or her own violation, the reporter shall not be required to provide his or her name on the form. All other requested information must be provided, so that an investigation can be conducted.

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The Naples Library

Whistleblower Policy

Acknowledgement/ Certification

(To be completed by Trustees, Officers, and Employees)

I. _____, hereby certifies that:

- a. I have received a copy of the Naples Library's Whistleblower Policy
- b. I have read and understand the Policy; and
- c. I agree to comply with the Policy.

Signature: _____

Date: _____

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Adopted by the Naples Library Board of Trustees on March 22, 2016. Reviewed on March 22, 2018.