



Whistleblower Protection Policy

POLICY

The Harold Alfond Foundation is committed to lawful and ethical behavior in all of its activities and requires its personnel, managers and trustees to conduct themselves at all times in a manner that complies with applicable laws and regulations. If at any time a concern exists regarding the propriety or legality of any action contemplated to be taken or that has been taken by any foundation personnel, manager, trustee, grantee, or vendor, as the action relates to foundation activities, or if an action needs to be taken in order for the foundation to be in compliance with law or appropriate ethical standards, the matter shall be addressed until it is satisfactorily resolved. Anyone who reports illegal or improper activity shall be protected and the foundation shall not discharge, demote, suspend, threaten, harass or in any manner discriminate against the person reporting in good faith what is perceived to be wrongdoing, violations of the law or unethical conduct.

PROCEDURES

Any perceived concern regarding the legality of foundation activities shall be addressed at its earliest and most solvable stage to the Chairman of the Board, any foundation trustee or the foundation's outside legal counsel, who shall be responsible for investigating and resolving the concern. If desired, concerns may be submitted confidentially or anonymously. Reported concerns shall be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation and prevent or correct the action. All reports shall be promptly investigated and appropriate corrective action taken if warranted by the investigation. The full board shall be advised that a perceived concern about the legality of the foundation's activity has been reported. There shall be no retaliatory action taken against the individual reporting a perceived concern regardless of the outcome of the investigation. Any personnel, manager or trustee of the foundation who retaliates against anyone who reports a concern in good faith shall be subject to discipline up to and including termination or removal from the board of trustees, as applicable.

Current Counsel: Barbara Wheaton, Esq.
Pierce Atwood
One Monument Square
Portland, ME 04101
207-791-1339