ALMOND 20th CENTURY CLUB LIBRARY
WHISTLEBLOWER and ETHICAL BEHAVIOR POLICY

The Twentieth Century Club Library (herein referred to as "TCCL") requires trustees, employees and volunteers to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. Employees and representatives of the organization must practice honesty, fair dealing, and integrity in fulfilling their responsibilities and comply with all applicable laws and regulations. The Board embraces the organization's values of integrity, honesty, ethical behavior, loyalty to the organization, courtesy, civility, respect for and co-operation among staff, trustees, volunteers and vendors. Harassment, because of gender, race, age, color, creed, religion, sexual orientation, disability or any other reason, whether conducted by of affecting, an employee, vendor, client, volunteer, board member or other individual connected with the library is strictly prohibited. This policy applies to all employees, directors, officers, club members, volunteers, and agents of the Library including the Director and the Board of Trustees.

The objectives of this Whistleblowers and Ethical Behavior Policy are to establish standards of conduct and procedures for:

- The submission of concerns, on a confidential basis, regarding:
  - (a) Harassment and bullying, sufficiently severe or pervasive to create a hostile work environment, or resulting in a tangible change in an employee's employment status or benefits.
  - (b) Questionable accounting or auditing actions by employees, trustees, officers, and other stakeholders of the organization.,
  - (c) Wrongful conduct such as a violation of applicable state and/or Federal laws and regulations; a serious violation of Library policy; or the use of Library property, resources or authority for personal gain or another non-Library purpose except as provided under Library policy.
- The receipt, retention, and treatment of complaints received by the organization regarding harassment, accounting, internal controls, auditing matters or other wrongful conduct.
- The protections from retaliatory actions of trustees, employees, club members and volunteers reporting concerns.

Reporting Responsibility

Each trustee, employee and volunteer of the TCCL has an obligation to report in accordance with this Whistleblower and Ethical Behavior Policy (a) harassment or bullying, (b) questionable or improper accounting or auditing matters, (c) violations and suspected violations of this policy and (d) wrongful conduct.

Authority of the Board of Trustees

All concern submitted in writing will be forwarded to the President of the Board of Trustees in accordance with the procedures set forth below. The President shall be responsible for designation the appropriate committee to investigate and make appropriate recommendations to the Board of Trustees with respect to the following: (a) concerns that originate from trustees and other non-employees or (b) concerns submitted by employees that have not been resolved by the Director to the satisfaction of the complainant.

Approved by Board 1/29/2026

Reporting Procedures and Corrective Action for Employees

Employees should first discuss their concern, in confidence, with their immediate supervisor. If, after speaking with their supervisor, the employee is convinced that their concern is unwarranted or that, in the opinion of the employees, the supervisor will take appropriate steps to resolve the employee's concern, no further action is required by the employee.

- However, further action is required if the employee (a) continues to have reasonable grounds to believe the concern is valid and that the response of their immediate supervisor is not adequate or (b) the immediate supervisor recommends that the issue should be referred to the higher level in the organization. In this situation the employee should write a formal complaint which the first level supervisor is obligated to take to the President of the Board of Trustees within five working days.
- The President of the Board of Trustees shall promptly inform the employee of receipt of the complaint. A copy of the complaint shall be forwarded to the Board of Trustees. The President of the Board of Trustees shall investigate the circumstances of the complaint in a timely fashion and where warranted, take disciplinary and other actions. At the completion of the investigation, the President of the Board of Trustees shall provide the employee initiating the complaint and the Board of Trustees with a written summary of the action taken.
- Notwithstanding the procedure stated above, if the employee's supervisor is the subject if the employee's concern or is possible involved, the employee may choose to discuss their concern directly and in confidence with the President of the Board of Trustees to investigate promptly the circumstances of the complaint in the manner stated in the previous paragraph.
- In extraordinary circumstances and after due consideration, an employee who suspects or believes that the President of the Board of Trustees is involved in unethical or illegal behavior may take their concerns directly to the Vice President of the Board of Trustees.

Reporting Procedures and Corrective Action for the Individuals Not Employed by the Twentieth Century Club Library

Trustees, volunteers, and members of the general public should submit concerns in writing directly to the President of the Board of Trustees. If the President of the Board of Trustees is not available or is the subject of the concern, the complaint should be directed to the Vice-President of the Board of Trustees.

- The President of the Board of Trustees shall be responsible for designating as appropriate committee, as circumstances dictate, to investigate and make appropriate recommendations to the Board of Trustees, with respect to all concerns received in writing. The designated committee has the authority to retain outside legal counsel, accountants, private investigators, or any other resources deemed necessary to conduct a full and complete investigation of the allegations.
- The President of the Board of Trustees shall inform the originator of the receipt of the written complaint. All trustees shall be informed of the nature of the complaint with emphasis on maintaining the confidentiality appropriate for personnel issues.
- The Board of Trustees and its designated committee shall resolve all complaints in a timely fashion and inform the individual submitting the complaint of the Board's final action.
- If the concern, for any reason, in not dealt with by the Board of Trustees to the satisfaction of the complainant, they may request a review by the Executive Director of STLS.

Approved by Board 1/29/2026

Acting in Good Faith

Anyone reporting a concern must act in good faith and have reasonable grounds for believing the information disclosed indicates harassment or bullying; a questionable or improper accounting or auditing practice; a violation or suspected violation of this policy; or wrongful conduct.

The act of making allegations that prove to be unsubstantiated, and that prove to have been made maliciously, recklessly, or with the foreknowledge that the allegations are false, will be viewed as serious disciplinary offense and may result in discipline, up to and including termination of employment or dismissal from the trustee or volunteer position. Such conduct any also give rise to other actions, including civil lawsuits.

Confidentiality

Reports of concerns and their investigators shall be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation. Disclosure of reports of concerns to individuals not involved in the investigation will be viewed as a serious disciplinary offense and may result in discipline, up to and including termination of employment. Such conduct may also give rise to other actions, including civil lawsuits.

No Retaliation Provision

This Whistleblower and Ethical Behavior Policy is intended to encourage and enable employees, trustees, volunteers and others to raise concerns within the library for investigation and appropriate action. With this goal in mind, no trustee, employee or volunteer who, in good faith, reports a concern shall be subject to retaliation or, in the case of an employee, adverse employment consequences. Moreover, an employee, trustee or volunteer who retaliates against someone who has reported a concern in good faith shall be subject to discipline, up to and including termination of employment or dismissal from the trustee or volunteer position.

Approved by Board 1/29/2026