## **Whistleblower Policy**

Employees of Carnegie Council have the responsibility to report any circumstance that they have actual knowledge of or a reasonable good faith belief that the Council's internal controls, auditing function, accounting systems, or governance policies are compromised or threatened. If an employee becomes aware of or has a reasonable good faith belief that the Council's internal controls, auditing function, accounting systems, or governance policies are compromised or threatened, the employee should report his or her concern immediately to the vice president or the president. Examples of such improprieties include the following, which is not an all-inclusive list:

- supplying false or misleading information on the Council's financial documents, including its tax return,
- providing false information to or withholding material information from the Council's auditors.
- violations of the conflict of interest policy,
- self-dealing, private inurement and private benefit (i.e. Council assets being used for personal gain or benefit),
- payment for services or goods that are not rendered or delivered,
- embezzlement, or
- planning, facilitating, or concealing any of the above.