

# Whistleblower Policy

for Semper Fi Flo Foundation

## 1. Purpose

Semper Fi Flo Foundation (“the Organization”) is committed to lawful, ethical, and accountable conduct in all of its activities. This policy provides a safe, confidential way for individuals to report concerns about suspected misconduct and protects them from retaliation for making a good-faith report.

This policy is intended to comply with Internal Revenue Service governance expectations, including those reflected in IRS Form 990 Annual Return.

## 2. Scope: Who and What Is Covered

This policy applies to:

- Board members, officers, committee members
- Employees, contractors, and volunteers

Covered concerns include, but are not limited to:

- Financial irregularities (fraud, theft, misappropriation, falsified reports)
- Conflicts of interest, self-dealing, or kickbacks – see the Organization’s Conflict of Interest policy
- Violations of law, regulation, Organization policies, or grant/contract terms
- Safety risks
- Retaliation against anyone who reports in good faith

The Organization also complies with the Minnesota Whistleblower Act, Minn. Stat. § 181.932, which prohibits an employer from discharging, disciplining, penalizing, or otherwise retaliating against an employee who, in good faith, reports a violation or suspected violation of law to the employer, a governmental body, or law enforcement; participates in an investigation; or refuses an order the employee reasonably believes is unlawful. The law further protects a reporting employee’s identity in specified circumstances and provides remedies for retaliation.

**Note:** Allegations of abuse or misconduct that fall under Carver County mandatory reporting, local authority to the Organization, must be handled **immediately** through required channels in addition to this policy.

## 3. Good-Faith Standard

Reports must be made **in good faith** i.e., with a sincere belief that the information is true. Reports known to be false or made with reckless disregard for the truth may result in disciplinary action.

#### **4. How to Report – SFF Internal Channels**

The Organization offers multiple channels so reporters can choose what feels safest:

##### **Primary Contact — Whistleblower Officer:**

Name/Title: Tracy Langheinrich, Secretary

Email: [tracylangheinrich@gmail.com](mailto:tracylangheinrich@gmail.com)

Phone: 952-913-7086

##### **Alternate Contact — Board President & Executive Director:**

Name/Title: Molly Ambrose

Email: [molly@semperflo.org](mailto:molly@semperflo.org)

Phone: 612-247-0862

##### **Anonymous Reporting Option:**

Voicemail box: 952-681-7660

#### **5. How to Report – External Mandatory Reporting:**

***Emergency or imminent safety risk: Call 911 first.***

##### **HOW TO REPORT to Local Authorities**

As an organization involved in social services, all adult participants are required to report to Report to local law enforcement within 24 hours of discovery under Minnesota state law.

- Carver County Child Protection Services for enforcement/child protective services for suspected abuse:
  - 952-361-1600 (24 hours/day, 7 days/week)
  - [cfsinfo@hennepin.us](mailto:cfsinfo@hennepin.us)
  - **Reporting Form:** [CARVER COUNTY HEALTH & HUMAN SERVICES AND LAW ENFORCEMENT REFERRAL OF SUSPECTED CHILD MALTREATMENT FORM](#)
- Minnesota statewide support for child protection questions:
  - 651-431-4661
  - [dcyf.child.safety-permanency@state.mn.us](mailto:dcyf.child.safety-permanency@state.mn.us)
- Vulnerable Adult Protection: Minnesota Adult Abuse Reporting Center (MAARC).
  - 800-880-1574
  - Carver County Adult Protection: [adultprotection@carvercountymn.gov](mailto:adultprotection@carvercountymn.gov)
  - Online Reporting Form: [Minnesota Adult Abuse Reporting Center \(MAARC\)](#)

#### **6. How to Report – Financial Fraud, Waste & Abuse**

Reports involving grant compliance issues will need to be reported to city, county, state, or granting agency hotlines depending on the funding source. Alternatively, financial irregularities such as fraud, theft, misappropriation can be directed to the Organization's internal reporting contacts noted above.

## **7. Confidentiality**

The Organization will protect the confidentiality of the reporter and any individuals named in the report to the maximum extent possible, consistent with thorough investigation and applicable law. Information may be shared strictly on a need-to-know basis.

## **8. Anti-Retaliation**

The Organization prohibits retaliation against anyone who, in good faith, reports a concern, assists with an investigation, or refuses to engage in illegal conduct. Retaliation can include termination, demotion, withholding opportunities, coercion, harassment, spreading rumors, or making threats.

- Proven retaliation will result in disciplinary action up to removal from the Organization, removal from the Board, termination of contract or employment, loss of volunteer privileges.
- Anyone who believes they experienced retaliation should report it immediately using the channels above.

Under the Minnesota Whistleblower Act, employees and/or contractors are protected under Minn. Stat. § 181.932, which prohibits retaliation against employees and/or contractors who, in good faith, report suspected legal violations, financial fraud, or refuse to participate in unlawful conduct.

## **9. Investigation Process**

### **A. Triage & Acknowledgment**

- The Whistleblower Officer logs the report and acknowledges receipt within 5 business days (unless the report is anonymous).
- Conflicts of interest are screened immediately. If a conflict exists, the Board President (or a disinterested officer) appoints an independent investigator or outside counsel.

### **B. Fact-Finding**

- Gather documents, interview relevant parties, and secure evidence promptly.

- Maintain an investigation file with dates, notes, and findings.

### **C. Findings & Resolution**

- The investigator issues written findings and recommended corrective actions to the Executive Committee or full Board (excluding any conflicted individuals).
- The Board determines appropriate measures (e.g., policy changes, employment actions, restitution, external reporting).

### **D. Feedback**

The Organization will provide the reporter with general status and outcome information to the extent appropriate and legally permissible.

### **E. Timeliness**

The Organization aims to complete investigations within 45 days, recognizing complex cases may require more time.

## **10. Roles & Responsibilities**

- **Whistleblower Officer:** Receives reports; ensures intake, confidentiality, logging, triage, and tracking; coordinates investigations; provides periodic status to the Board.
- **Board of Directors:** Oversees investigations, ensures independence, approves corrective actions; addresses conflicts at the Board level.
- **Executive Committee:** May act between meetings if urgent, reporting all actions to the full Board.
- **All Covered Persons:** Cooperate fully and truthfully in investigations; preserve confidentiality.

## **11. Documentation & Record Retention**

- All reports, logs, investigation notes, findings, and Board actions will be securely and confidentially retained for at least seven (7) years (or longer if required by law, grant, or insurance).
- Access to these records is restricted to authorized individuals.
- See the Organization's **Records Document and Destruction Policy**.

## **12. Coordination with Other Policies & Laws**

This policy works alongside:

- Code of Conduct, Conflict of Interest, Financial Controls, Vulnerable Adult Protection, Child Protection, and Anti-Harassment policies
- Mandatory reporting laws for suspected abuse or neglect
- Any facility, league, or governing body rules that apply

Where laws or external rules impose stricter requirements, those requirements control.

### **13. Training & Communication**

- New board members, staff, and volunteers receive training on this policy during onboarding.
- An annual refresher highlights how to recognize/report concerns, anti-retaliation protections, and where to find the policy and forms.
- Reporting channels are posted on the Organization website or handbook.

### **14. Policy Review**

The Board reviews this policy **annually** and after any significant incident to ensure it remains effective and current.

### **15. Adoption**

This policy was adopted by the Board of Directors of **Semper Fi Flo Foundation Organization** on March 2, 2026 and is effective immediately.