



## **TRIANGLE INC. Whistleblower Policy**

### **Introduction**

The whistleblower policy of Triangle Inc. is intended to provide a mechanism for the reporting of illegal activity including physical, sexual, economic, and emotional abuse of Triangle participants or the misuse of Triangle Inc. assets while protecting the employees or volunteers who make such reports from retaliation.

Staff, board members, consultants, and volunteers are encouraged to report suspected fraudulent or dishonest conduct (i.e., to act as “whistleblower”), pursuant to the procedures set forth below.

### **Reporting**

A person’s concerns about possible unlawful activity or fraudulent or dishonest use or misuse of resources or property should be reported to his or her supervisor or, if suspected by a volunteer, to the staff member supporting the volunteer’s work. A person’s concerns about abuse perpetrated by a Triangle staff member against a Triangle participant, person with a disability, or other member of the Triangle community should be reported to the Director of Human Resources, their Direct Supervisor, Triangle Inc.’s CEO, or CFO.

If, for any reason, a person finds it difficult to report his or her concerns to a supervisor or staff member supporting the volunteer’s work, the person may report the concerns directly to Triangle Inc.’s Chief Executive Officer, Chief Financial Officer or Director of Human Resources. Alternately, to facilitate reporting of suspected violations where the reporter wishes to remain anonymous, a written statement may be submitted to one of the individuals listed above.

### **Whistleblower Protection**

#### **Triangle Inc. will protect whistleblowers as defined below:**

- Triangle Inc. will use its best efforts to protect whistleblowers who act in good faith against retaliation. Whistle blowing complaints will be handled with sensitivity, discretion, and confidentiality to the extent allowed by the circumstances and the law. Generally, this means that whistleblower complaints will only be shared with those who have a need to know so that Triangle Inc. can conduct an effective investigation, determine what action to take based on the results of any such investigation, and in appropriate cases, with law enforcement personnel. (Should disciplinary or legal action be taken against a person or persons as a result of a whistleblower complaint, such persons may also have the right to know the identity of the whistleblower.)
- Employees, consultants, and volunteers of Triangle Inc. may not retaliate against a whistleblower for informing management about an activity which that person believes to be fraudulent, dishonest or abusive to a Triangle participant, person

with a disability, or other member of the Triangle community with the intent or effect of adversely affecting the terms or conditions of the whistleblower's employment, including but not limited to, threats of physical harm, loss of job, punitive work assignments, or impact on salary or fees. Whistleblowers who believe that they have been retaliated against may file a written complaint with the chief executive officer or to the president of the board. Any complaint of retaliation will be promptly investigated and appropriate corrective measures taken if allegations of retaliation are substantiated. This protection from retaliation is not intended to prohibit supervisors from taking action, including disciplinary action, in the usual scope of their duties and based on valid performance-related factors.

### **Questionable Conduct**

This policy is designed to address situations in which an employee or volunteer suspects another employee or volunteer has engaged in illegal acts or questionable conduct involving Triangle Inc.'s assets or the abuse or maltreatment of a person with a disability or other member of the Triangle community. This conduct might include outright theft (of equipment or cash), fraudulent expense reports, misstatements of any accounts to any manager or to Triangle Inc.'s auditors, or even an employee's conflict of interest that results in financial harm to Triangle Inc. Triangle Inc. encourages staff and volunteers to report such illegal or questionable conduct.

### **Making a Report**

If an employee or volunteer suspects illegal conduct including abusive behavior or conduct involving misuse of Triangle Inc.'s assets or in violation of the law, he or she may report it and will be protected against any form of harassment, intimidation, discrimination, or retaliation for making such a report in good faith.

Employees can make a report to any of the following Triangle Inc. executives at any time: their direct supervisor, Triangle Inc.'s chief executive officer, chief financial officer, or the director of human resources. Triangle Inc. will promptly conduct an investigation into matters reported, keeping the informant's identity as confidential as possible consistent with our obligation to conduct a full and fair investigation.

Alternatively, employees or volunteers can make a report by calling either the board president or the chair of the audit committee.

### **Investigation of Reports**

All reported violations will be promptly and thoroughly investigated and acted on appropriately. If a complaint alleging an ethical violation requires additional action, Triangle Inc. will respond promptly. Staff members must cooperate with any investigation and provide accurate and truthful information. Staff members must not disclose or discuss the fact that an investigation is being conducted or has been conducted and must not disclose the results of any investigation to anyone except to the extent allowed by the compliance officer. Triangle Inc.'s compliance officer is the HR Director. If possible, the staff member making the initial report will be informed about the status of the investigation and the outcome of the matter. However, Triangle Inc. has an obligation of confidentiality to all staff members, including those being investigated.

### **Illustrative Types of Concerns**

The following is a non-exhaustive list of the kinds of improprieties that should be reported:

1. Supplying false or misleading information on Triangle Inc.'s financial or other public documents, including its Form 990.
2. Providing false information to or withholding material information from Triangle Inc.'s board or auditors.
3. Destroying, altering, mutilating, concealing, covering up, falsifying, or making a false entry in any records that may be connected to an official proceeding, in violation of federal or state law or regulations.
4. Altering, destroying, or concealing a document, or attempting to do so, with the intent to impair the document's availability for use in an official proceeding or otherwise obstructing, influencing, or impeding any official proceeding, in violation of federal or state law or regulations.
5. Embezzling, self-dealing, private inurement (i.e., Triangle Inc.'s earnings to the benefit of a director, officer, or senior management) and private benefit (i.e. Triangle Inc.'s assets being used by anyone in the organization for personal gain or benefit).
6. Paying for services or goods that are not rendered or delivered.
7. Discriminating against an employee or potential employee due to a person's race, color, religion, sex, sexual orientation, national origin, age, physical or mental impairment, or veteran status.
8. Violating Triangle's Statement of Values and Code of Ethics, Conflict-of-Interest Policy, Harassment Policy, or Equal Employment Opportunity Policy.
9. Physically harming a person with a disability or other member of the Triangle community; Any sexual touching of any Triangle participant; threatening a Triangle participant with physical harm; stealing a Triangle participant's money or using that person's money without his/her consent; or any other allegation of abuse that is substantiated by the Massachusetts Disabled Persons Protection Commission.
10. Facilitating or concealing any of the above or similar actions.

My signature below indicates my receipt and understanding of this Policy. I also verify that I have been provided with an opportunity to ask questions about the Policy.

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Employee Signature and Date