

# Home Builders Association of Connecticut, Inc.

## Whistleblower Policy

This Whistleblower Policy of the Home Builders Association of Connecticut, Inc. (HBACT): (1) encourages staff and volunteers to come forward with credible information on illegal practices or serious violations of adopted policies of the HBACT; (2) specifies that the HBACT will protect the person from retaliation; and (3) identifies where such information can be reported.

**1. Encouragement of reporting.** The HBACT encourages complaints, reports or inquiries about suspected illegal practices or serious violations of the HBACT's policies, including illegal or improper conduct by the HBACT itself, by its leadership, or by others on its behalf. Appropriate subjects to raise under this policy would include financial improprieties, accounting or audit matters, ethical violations, conflicts of interest, or other similar illegal or improper practices or policies. Other subjects on which the HBACT has existing complaint mechanisms should be addressed under those mechanisms, such as raising matters of alleged discrimination or harassment via the HBACT's human resources channels, unless those channels are themselves implicated in the wrongdoing. This policy is not intended to provide a means of appeal from outcomes in those other mechanisms.

**2. Protection from retaliation.** The HBACT prohibits retaliation by or on behalf of the HBACT against staff or volunteers for making good faith complaints, reports or inquiries under this policy or for participating in a review or investigation under this policy. This protection extends to those whose allegations are made in good faith but prove to be mistaken. The HBACT reserves the right to discipline persons who make bad faith, knowingly false, or vexatious complaints, reports or inquiries or who otherwise abuse this policy.

**3. Where to report.** Complaints, reports or inquiries may be made under this policy on a confidential or anonymous basis. They should describe in detail the specific facts demonstrating the bases for the complaints, reports or inquiries. They should be directed to the HBACT's Chief Executive Officer (CEO) or Chairman of the Board of Directors & President; if both of those persons are implicated in the complaint, report or inquiry, it should be directed to another elected Senior Officer (e.g., the First Vice President, Treasurer, Immediate Past President of the Board). The HBACT will conduct a prompt, discreet, and objective review or investigation. Staff or volunteers must recognize that the HBACT may be unable to fully evaluate a vague or general complaint, report or inquiry that is made anonymously.