

Lewistown United Ministries In Neighborhood Action (DBA LUMINA Center)

Whistleblower Policy

I. Purpose

LUMINA Center is committed to high standards of ethical, legal and financial conduct. This policy encourages employees and volunteers to report suspected violations of law, regulations or internal policies - including fraud, theft, or misuse of funds - without fear of retaliation.

II. Definitions

- **Whistleblower**: Any employee, board member, or volunteer of LUMINA Center, who report suspected wrongdoing in good faith.
- **Good Faith**: A report is in “good faith” if the reporter reasonably believes the information is true, even if it is later proven false.

III. Retaliation Protection

No employee or volunteer of LUMINA Center who in good faith reports a concern or cooperates in an investigation shall suffer harassment, retaliation, or adverse employment consequences (including termination or demotion). Any employee who retaliates against a whistleblower is subject to disciplinary action, up to and including termination.

IV. Reporting Process

Complaints should be submitted to [e.g. LUMINA Center Executive Director or Board Chair]. If the complaint involves one of these individuals, the report should be made to another member of the Board of Directors. Reports may be submitted on a confidential or anonymous basis.

V. Investigation

All reports will be promptly and thoroughly investigated by [designated personnel/independent investigator] and corrective action will be taken if necessary.

- Investigation will remain confidential to the extent possible.
- The reporting individual (if known) will be informed of the investigation’s resolution.
- All employees have a duty to cooperate with investigations.

VI. Scope

LC115

Implemented: 05/18/2026 Revision: _____ - _____

Revision Date: _____ - _____ Page 1 of 3

The policy covers, but is not limited to:

- Violations of federal, state, or local laws.
- Questionable accounting, auditing or financial reporting.
- Misappropriation of funds, embezzlement, or fraud.
- Violation of conflict-of-interest policies.

VII. Acting in Good Faith/False Allegations

Anyone filing a complaint concerning a violation must act in good faith and have reasonable grounds to believe the information indicates a violation. While LUMINA Center protects those who report in good faith, intentionally making false or malicious allegations is considered misconduct and may lead to disciplinary action. Maliciously reporting false information is not protected by this policy.

Annual Affirmation Statement

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The Whistleblower Policy of LUMINA Center requires an annual affirmation that you received, read, understand and agree to comply with the Whistleblower Policy. Please print and sign your name on this Annual Affirmation Statement indicating your affirmation as described above.

Please return this Statement to the Executive Director or the Secretary of the Board of Directors of LUMINA Center each year by July 31.

Your Printed Name: _____

Your Signed Name: _____ Date: _____