

EMPLOYEE MANUAL

FOR

SANTA FE CONSERVATION TRUST

A NONPROFIT CORPORATION

January 1, 2014

ADOPTED FEBRUARY 8, 2014 BY THE SFCT BOARD OF DIRECTORS

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INTRODUCTION

The Santa Fe Conservation Trust ("SFCT") is a non-profit, 501(c)(3) corporation, dedicated to preserving the spirit of place among the communities of northern New Mexico by protecting open spaces and critical wildlife habitat by creating trails and protecting the traditional landscapes of our diverse cultures. SFCT aims to protect and enhance key natural areas, ranch and agricultural lands, river and stream corridors, trails, and the natural open lands that define and sustain our rich and memorable landscape.

SFCT accomplishes its mission by working with people in culturally diverse communities in ways that enhance community values, create meaningful connections between people and the land, preserve heritage and encourage collaborative action.

SFCT is committed to the highest standards of open, honest, ethical behavior. We expect that all of our employees will act in accordance with these standards and will enhance the credibility and professional image of SFCT through the quality of their work and the quality of their interactions with the public and colleagues within and outside SFCT.

ABOUT THIS MANUAL

This manual is provided for your use as a reference and partial summary of the employee policies and work standards for Santa Fe Conservation Trust ("SFCT"). This manual cannot and does not address every employment situation that may develop. As an employee of SFCT, you are expected to be familiar with all of the topics covered in the following pages.

The rules and regulations contained in this manual do not in any manner alter your status as an employee at-will, as explained below.

Because governmental laws and the requirements of SFCT may change, all of the following policies and procedures are subject to change, modification, supplementation and revocation without prior notice. New policies are adopted by an affirmative vote of a majority of the members of the SFCT Board. Whenever possible, it is the intent of SFCT to discuss proposed policy changes with the staff, with the aim of achieving consensus, prior to presentation to the Board. We urge you to check with your Executive Director to obtain current information on any policy.

This manual is the property of SFCT. Any duplication or distribution of this manual, or any part thereof, is prohibited.

Section 1: WORK STANDARDS

A) DISCRIMINATION AND HARASSMENT

To the fullest extent required by applicable state and federal law, SFCT provides equal employment opportunity for everyone regardless of age, sex, color, race, national origin, religion, sexual orientation or disability. Please refer to Appendix A: Santa Fe Conservation Trust Equal Employment Opportunity Policy

SFCT is committed to providing a work environment that is free from all forms of harassment based on age, sex, color, race, creed, national origin, religion, sexual orientation or disability, as required by applicable state and federal law. SFCT simply will not condone or tolerate unlawful harassment. The actions of any employee who engages in such conduct are not to be considered the actions of SFCT, and SFCT does not accept any liability for such actions. Please refer to Appendix B: Santa Fe Conservation Trust Harassment Policy.

B) Ethical Standards

Santa Fe Conservation Trust (SFCT) requires directors, officers and employees to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. Employees and representatives of SFCT must practice honesty and integrity in fulfilling their responsibilities, and they must comply with all applicable laws and regulations. Please refer to Appendix C: Santa Fe Conservation Trust Whistleblower Policy.

C) CLIENT RELATIONS

SFCT's success depends upon the quality of the relationships between SFCT and its clients. Our clients' impression of SFCT and their interest and willingness to obtain our services are formed by the people who serve them. You are our ambassador. The more goodwill you promote, the more our clients and partners will respect and appreciate you, SFCT, and our products and services.

Here are several things you can do to help give clients a good impression of SFCT:

- Act competently and deal with clients in a courteous, candid and respectful manner.
- Communicate pleasantly and respectfully with other employees at all times.
- Follow up on requests and questions promptly, provide businesslike replies to inquiries, and perform all duties in an orderly manner.
- Take great pride in your work and enjoy doing your very best.

D) Conflicts of Interest

SFCT attempts to make a good faith effort to prevent any violations of the law, loss of tax-exempt status or a successful lawsuit against the organization when contemplating entering into a transaction or arrangement that might benefit the private interest of a director, officer or key employee of SFCT, which might constitute a Conflict of Interest or breach of fiduciary duty, or might result in a possible excess benefit transaction. Please refer to Appendix D: Santa Fe Conservation Trust Conflict of Interest Policy. This policy must be signed by all directors of the board, employees and other insiders on an annual basis.

E) CONFIDENTIALITY

All employees must, without exception, maintain the absolute confidentiality of all client and client-related matters and information and all confidential and proprietary information relating to SFCT, including, but not limited to, client correspondence and communications, property locations and access codes, client financial information, client documents or records, client lists, and employee compensation. Additionally, no documents of any kind should be released to persons other than SFCT employees and board members without prior approval of SFCT. Please refer to Appendix E: Donor Privacy Policy.

F) OFFICE HOURS

SFCT is open for business from 9:00 a.m. until 5:00 p.m., Monday through Friday. Unless instructed or authorized otherwise, employees are expected to work between the hours of 9:00 a.m. and 5:30 p.m., Monday through Friday with a one-half (½) hour break for lunch, except for scheduled holidays, as explained below. SFCT also has a fully functional remote server and VPN, allowing for work from home when necessary. From time to time, due to work demands, it may be necessary for employees to work extra hours on weekends or before or after regular office hours. Your actual working hours can be flexible upon approval of the Executive Director.

Work can be conducted remotely due to inclement weather, with permission of the Executive Director.

G) ABSENCE FROM WORK AND ARRIVING LATE TO WORK

You are expected to be at the office and ready to work or on duty outside of the office, as required by your position, when you are scheduled to start work, and you are expected to remain at work until the conclusion of your workday, except for lunch.

SFCT recognizes that from time to time it may be necessary for you to be absent from work. SFCT is aware that emergencies, illnesses, or pressing personal business that cannot be scheduled outside your work hours may arise.

If you are unable to report to work, if you will arrive late or if you must leave the office during your workday, you must contact the Executive Director as soon as possible before the start of your workday or absence. If you are unable to call in yourself, be sure to have someone call on your behalf. If the Executive Director is not available when you call, leave a detailed message for him/her describing the circumstances, including your expected time of arrival and a telephone number where you can be reached.

H. EXPENSE REIMBURSEMENT

Employees may be reimbursed for reasonable and necessary expenses paid or incurred in the performance of their duties for SFCT, in accordance with SFCT's budget and guidelines. You must have the Executive Director's authorization prior to incurring an expense on behalf of SFCT other than for routine budgeted expenditures (such as coffee, office supplies, etc.)

J. USE OF INTERNET, EMAIL, COMPUTER NETWORK, COMPUTERS

All business equipment, computers, electronic and telephone communications systems, and all communications and stored information transmitted, received, or contained in SFCT's

information systems are the property of SFCT and are intended to be used solely for job-related purposes, except as otherwise expressly permitted in this policy. To ensure proper use of computers, communications systems, and business equipment, SFCT may access and monitor the use of these systems and equipment from time to time to ensure compliance with this policy. **Because SFCT reserves the right to access and monitor the use of these systems, no employee should have any expectation of privacy in connection with the use of this equipment or the transmission, receipt or storage of information in such equipment, whether the information is personal or business-related.**

Except as expressly permitted in this policy, SFCT strictly prohibits non-job-related uses of its software and business equipment. SFCT reserves the right to require any employee to disclose any pass code or procedures used by the employee in the transmission, receipt or storage of any information in any such equipment.

K. SECURITY

Maintaining the security of SFCT's office and its computer system is every employee's responsibility. Develop habits that ensure security as a matter of course, such as:

- Always keep cash and checks properly secured. Do not leave them lying on desk tops, counters, etc.
- Always keep client information, including landowners' personal information and security access codes, properly secured.

L) SMOKING

Smoking is not allowed in SFCT's office or the building in which it is located.

M) STANDARDS OF CONDUCT

SFCT employees are expected to maintain the highest standard of ethical and professional conduct. While at work or representing SFCT in any capacity, employees shall avoid activities and behaviors which are inconsistent or conflict with the mission and goals of SFCT.

While it is the policy of SFCT to treat all persons in a fair, unbiased, non-discriminatory manner, SFCT reserves the right to take any disciplinary action up to and including dismissal for certain conduct. Some examples of such conduct:

- Poor work performance
- Unprofessional behavior
- Misconduct on the job, or misconduct off the job that adversely affects the organization
- Clear conflicts of interest involving personal material gain
- Insubordination, including refusal to perform work assigned
- Falsification of employment application or other organizational records, books, or documents
- Unethical, dishonest, or criminal conduct
- Reporting to work under the influence of alcohol or drugs not taken under the direction of a licensed physician, or use or sale of alcohol or drugs on the premises

SECTION 2: EMPLOYEE POLICIES AND BENEFITS

A) PERSONNEL ADMINISTRATION

The task of handling personnel records and related personnel administration functions has been assigned to the Executive Director at SFCT. Questions regarding insurance, wages, payroll and interpretation of personnel policies should be directed to him/her.

B) PERSONNEL FILE

SFCT maintains job-related information about current and former employees in its official personnel files and other records, as required or permitted by law. All employees are responsible for informing the Executive Director of any changes in the following information:

- Legal name
- Home address
- Home telephone number
- Persons to call in case of emergency and their current telephone number
- Number of dependents
- Change in any beneficiaries
- Number of exemptions claimed for federal and state income taxes

Current employees may have reasonable access to inspect and copy the contents of their personnel records by contacting the Executive Director in advance and scheduling an appointment. SFCT reserves the right to supervise the review or copying of such materials and to remove sensitive information prior to review or copying, as permitted by law.

Ordinarily, access to an employee's personnel records is restricted to the employee, the Executive Director, and other employees with a need for access.

In response to requests for information about a current or former employee, SFCT may verify basic information about the employee, such as employment status, dates of employment, reason for separation and last salary without notice to the employee. Additional information from personnel records may be made available to others if subpoenaed or otherwise required by law. SFCT also reserves the right to cooperate with law enforcement, public safety and health officials who have a valid need to obtain information about current or former employees.

C) INJURIES AND ILLNESSES WHILE ON THE JOB

If you hurt yourself or become ill on the job, you must advise the Executive Director immediately. If you fail to report an injury or illness, you may jeopardize your right to collect workers' compensation payments.

D) FEDERAL EMPLOYMENT ELIGIBILITY REQUIREMENTS

Federal regulations require that before becoming an employee, all applicants must complete and sign federal form I-9, Employment Eligibility Verification Form. All applicants who are hired must present documents of identity and eligibility to work in the United States.

E) PERFORMANCE AND COMPENSATION REVIEWS

Employees can expect to receive frequent informal feedback from the Executive Director, colleagues and the SFCT Board of Directors for the purpose of continuously improving the overall performance of SFCT. Employees are expected to participate in the development of specific goals for their work several times during the year.

SFCT may conduct performance evaluations of its employees from time to time, but it is not required to do so. In addition, employees may receive from time to time a formal written evaluation.

SFCT endeavors to conduct compensation reviews annually, usually at the end of each calendar year. Compensation decisions, including any increase or reduction in the amount of compensation to be paid an employee, are made at the sole discretion of SFCT. The fact that SFCT conducts compensation reviews is not a guarantee or promise that compensation will be increased.

The fact that SFCT may conduct performance and compensation reviews does not in any way alter your status as an employee at-will. In addition, anything that is said or written during any evaluation does not alter the at-will employment relationship as described in this manual.

F) FULL-TIME AND PART-TIME EMPLOYEES

Typically, employees fall within two categories based on their work schedules;

1. Full-Time: Salaried, 32-40 hours per week
2. Part-Time: Salaried, 25-31 hours per week

Note: Consultants and Contractors are not employees of SFCT and are responsible for complying with all applicable laws, rules and regulations including payment of federal, state and local taxes or contributions imposed or required under the social security, worker's compensation and income tax laws.

Employees who work a regularly scheduled work week of at least 25 hours ("Eligible Employees") will be eligible to participate in SFCT's retirement plan and health insurance plan, to the extent any such plans are available, and are eligible for paid leave, paid holidays and reimbursement for professional development programs, seminars and conferences, all as described below.

G) EMPLOYEE COMPENSATION AND OVERTIME COMPENSATION

Unless otherwise specified at the time of employment, all employees of SFCT are paid on a salary basis, not an hourly wage, although an equivalent hourly rate may be used for payroll calculations.

If a future position was determined to be non-exempt (paid hourly and whose job duties are not exempt from the overtime requirements of state and federal laws) overtime pay will be paid at one and one-half the regular straight time hourly rate for all hours worked in excess of forty hours (40) in a designated work week. The designated work week begins on Monday and ends on Sunday.

H) BONUSES

Bonuses may from time to time be awarded at the sole and absolute discretion of SFCT.

I) PAYCHECKS

All employees receive employment compensation in the form of payroll checks issued by SFCT every two weeks. Employees are not to be paid in cash and may not be paid out of petty cash or from any similar source.

Employee compensation is subject to various withholdings as required by applicable state and federal law. These deductions will be itemized on your check stub.

Every effort is made to avoid errors in your paycheck. It is the employee's responsibility to check each pay stub. If you believe an error has been made, advise the Executive Director immediately.

J) PAID LEAVES AND HOLIDAYS

a) Vacation

During the first year of service, Eligible Employees are entitled to fifteen (15) days equivalent of paid vacation, accruing at the rate of 1 hour per 17 1/3 hours of employment with SFCT. For a full-time, 40-hour per week employee, this translates to 120 hours (15 days) of vacation in the first year.

During the second and subsequent years of service, Eligible Employees are entitled to twenty (20) days equivalent of paid vacation, accruing at the rate of 1 hour per 13 hours of service. For a full-time, 40-hour per week employee, this translates to 160 hours (20 days) of vacation per calendar year. The equation for earned vacation hours is updated upon the anniversary date of employment.

All paid vacation should be used by the end of the year marked by the employee's anniversary date of hire. However, up to 40 unused paid vacation hours from the preceding calendar year may be carried forward until the last day of December of the following year. Employees will not be compensated for unused expired vacation.

To schedule paid vacation time, an employee must submit in advance the proposed dates to the Executive Director for approval of the proposed dates.

Requests for vacation will be approved in the discretion of SFCT based on a number of factors, including, but not limited to, business needs and staffing requirements.

Upon termination of employment, an employee will be paid for unused and unexpired paid vacation time accrued to the effective date of termination. Expired vacation time will not be counted in calculating compensation for unused paid days.

Employees who are not Eligible Employees are not entitled to paid days of leave.

b) Health and Family Leave

Health and Family Leave can be taken for employee illness and medical care, for the birth or adoption of a child, to care for a child, parent, spouse, or domestic partner with a serious health condition, or for travel due to family illnesses or funerals.

Eligible employees accrue ten (10) days per year (one day being 1/5 of the employee's weekly salaried hours) of paid Health and Family Leave (Leave) at a rate of .83 day per month beginning immediately upon employment. Leave can be accumulated up to a maximum of 60 days. Absences of longer than one week require either pre-approval by the Executive Director or verification of the reason for the leave. Leave cannot be taken before it is accrued. If an employee has used all accrued Leave and must remain away from work longer, she or he must use available vacation time and unpaid leave (see below), in that order. Employees are not paid for unused Leave on their separation from SFCT.

c) HOLIDAYS

SFCT provides up to eleven (11) paid holidays (listed below) per calendar year. SFCT recognizes the following holidays during which the office will be closed if the holiday falls on a weekday:

- New Year's Day
- Martin Luther King Day (3rd Monday in January)
- President's Day
- Memorial Day (last Monday in May)
- Juneteenth (June 19th)
- Independence Day
- Labor Day (first Monday in September)
- Columbus Day (2nd Monday in October)
- Veteran's Day
- Thanksgiving Day
- Christmas Day

If a paid holiday falls on a Saturday or Sunday, SFCT may, in its sole discretion, recognize the holiday on either the preceding Friday or following Monday. In a particular calendar year, SFCT may in its sole discretion cancel a holiday and add it on to another holiday in that year. SFCT also reserves the right to modify, cancel or adjust paid holidays in its sole discretion.

Employees who are not Eligible Employees are not entitled to paid holidays.

d) UNCOMPENSATED ABSENCE

Any excused absence from SFCT during the employee's normal working hours that is not treated as paid leave shall be treated as an unpaid leave of absence. Time attributable to a

leave of absence shall be deducted from the employee's salary on a proportionate basis, i.e., the employee's salary for the next pay period shall be reduced by a proportionate amount equal to the employee's normal salary for that pay period multiplied by a fraction the numerator of which is the number of unpaid days of absence in that pay period and the denominator of which is the number of working days in that pay period.

K) PROFESSIONAL DEVELOPMENT

SFCT expects its staff to remain current in their areas of expertise, and to continuously grow and develop their professional skills. SFCT will support this growth by paying all or a portion of the cost for relevant seminars, meetings, and conferences attended by Eligible Employees. Requests must be submitted to the Executive Director in advance and are subject to SFCT's sole approval.

L) RETIREMENT PLAN

If SFCT implements a 401(k) or other salary deferral plan, Eligible Employees may elect to enroll in such plan according to its terms. Please inquire with the Executive Director as to the availability of such retirement plan.

M) HEALTH INSURANCE

After thirty (30) calendar days of continuous employment, Eligible Employees become eligible to enroll for SFCT's health insurance benefit. Eligible Employees who decline to enroll at that time may not be eligible to enroll until the next enrollment period. Eligible Employees should review the health insurance plan materials to determine when such enrollment periods occur.

For Eligible Employees who regularly work 32-40 hours per week, SFCT will pay 75% of the premium for the health insurance benefit. For Eligible Employees who regularly work 25-31 hours per week, SFCT will pay 50% of the premium for the health insurance benefit. SFCT pays the portions of the premium described above only for the coverage of the participating Eligible Employee. The Eligible Employee may elect to add health coverage for a spouse, children or both; all of the additional cost for such coverage will be paid by the Eligible Employee through payroll deduction in pre-tax dollars.

N) NEW MEXICO'S AT-WILL EMPLOYMENT LAWS

Your employment with SFCT is at will. Being an at-will employee means that either you or SFCT can discontinue or terminate your employment at any time with or without notice and with or without cause. There is no specified duration for your employment with SFCT.

This manual and any other documents provided to you regarding employee policies or procedures do not constitute or in any manner create an employment agreement or contract, either express or implied, and the rules and regulations contained in this manual do not in any way alter the at-will employment relationship between you and SFCT. Additionally, a violation of any of the policies, rules, procedures or requirements set forth in this manual is not required for termination of employment. The fact that you may receive a warning or other admonition for failing to comply with any policy, procedure, rule or requirement does not mean that a warning or admonition of any kind is required as a condition for termination of employment.

O) COMPENSATION AND BENEFITS SUBJECT TO CHANGE

Employee compensation is subject to modification, including reduction, any time in the sole discretion of SFCT.

All employee benefits are subject to modification, reduction or elimination at any time in the sole discretion of SFCT.

Approved on the 23rd day of August, 2023.



Brant Goodman, Secretary, SFCT

Appendix A: Equal Employment Opportunity Policy

Santa Fe Conservation Trust
EQUAL EMPLOYMENT OPPORTUNITY POLICY
Policy#
Adopted: 2009
Updated: December 4, 2018

It is the policy of the Santa Fe Conservation Trust to be an equal opportunity employer. SFCT believes that equal opportunity is important for the continued success of our organization. In accordance with state, federal, and municipal laws, SFCT complies with all applicable laws that prohibit discrimination against employees (or applicants for employment) because of race, disability, color, creed, religion, gender, age, sexual orientation, gender identity, national origin, ancestry, citizenship, veteran status, or any other applicable protected classification in hiring, promoting, demoting, training, benefits, transfers, layoffs, terminations, recommendations, rates of pay, or other terms and conditions of employment. Opportunity is provided to all employees and applicants based on qualifications and job requirements.



Secretary



Date

Appendix B: Harassment Policy

Santa Fe Conservation Trust HARRASSMENT POLICY Policy#

Adopted: August 4, 2009

Updated: February 4, 2012

Updated: October 19, 2018

As part of Santa Fe Conservation Trust's (SFCT) policy to ensure equal opportunity to all, regardless of sex, sexual orientation, race, ethnic or national origin, age, disability, veteran status, religion, or any other characteristic that is protected by law, SFCT is committed to maintaining a work environment that is free from discrimination and in which all employees and board members can devote their full attention and best efforts to their jobs.

Harassment has no place at work. SFCT will not tolerate any form of harassment based on an employee's sex, sexual orientation, race, national or ethnic origin, age, disability, religion, or any other characteristic that is protected by law.

This policy applies to management and non-management employees, board members, and non-employees who harass our employees or board members.

Examples of "harassment" that are forbidden include offensive language, jokes, or other physical, verbal, or written conduct relating to sex, sexual orientation, race, religion, national or ethnic origin, age, disability, veteran status, or other factor protected by law that would make a reasonable person feel uncomfortable or would interfere with the person's work performance.

The examples below are not exhaustive. It is not possible to list every type of behavior that could be considered harassment in violation of this policy. In general, any conduct based on these traits that could interfere with an employee's work performance or could create an offensive environment is considered harassment in violation of this policy. ***This is the case even if the offending person did not intend to be offensive. You must be sensitive to the feelings of others.***

Sexual Harassment

Sexual harassment (both opposite-sex and same-sex) is strictly prohibited. Examples of behaviors that violate this policy include:

- Sexually offensive jokes or comments
- Touching that is sexual in nature
- Conditioning benefits of employment upon the employee's response to sexual requests
- Displaying sexual materials, including materials that have been copied or downloaded from the Internet, obtained through electronic mail, or from any other source
- Retaliating against an employee who complains of harassment

Harassment Based on Race, National or Ethnic Origin, Gender, Sexual Orientation, Age, Disability, Veteran Status, Religion or Other Protected Factors

SFCT also prohibits harassment based on race, color, national or ethnic origin, gender, sexual orientation, disability, religion, veteran status, or other protected factors. Examples of forbidden harassment include:

- Jokes, parodies, pranks, name-calling, or negative comments based on one of these categories
- Displays of any types of written, published, or other materials or pictures containing negative images or inferences regarding these categories, including electronically obtained materials
- Retaliating against an employee for complaining of harassment under this policy

Reporting Harassment

SFCT cannot investigate or work out matters of which its management or Board is not aware. Every employee has a duty to *immediately* report harassment so that SFCT can try to resolve the situation. This is true whether the alleged harasser is an employee, a manager, a board member, or a non-employee, such as a customer or a vendor with whom SFCT does business. You should report harassment when

- You feel you have been harassed
- You have seen or heard of someone else who has been harassed

To report harassment, report to the Executive Director, or if it involved the Executive Director, report to the Board Chair. Once your report has been received, SFCT will:

- Conduct a prompt and thorough investigation
- Discuss the results (although not necessarily any disciplinary action taken against the alleged harasser) with the complaining person and, if appropriate, the action to be taken
- To the extent possible, limit information about the investigation and results to those with a need to know
- When necessary, take appropriate corrective action, up through and including termination

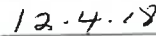
No employee or board member will be punished or subject to retaliation for bringing a report of harassment in good faith to SFCT's attention or for cooperating in an investigation.

Our Commitment to an Effective Harassment Policy

Finally, if you feel SFCT has not met its obligations under this policy, or if you are not satisfied with the way in which your report of harassment was handled, or you feel that you have been retaliated against for reporting harassment, you should contact the Vice Chair. Your assistance in following the policy is the only way to make the policy work for all of us.



Secretary



Date

Appendix C: Whistleblower Policy

The Santa Fe Conservation Trust
Whistleblower Policy
Policy #
Adopted: (unknown)
Updated: October 19, 2018

General

Santa Fe Conservation Trust (SFCT) requires directors, officers and employees to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. Employees and representatives of SFCT must practice honesty and integrity in fulfilling their responsibilities, and they must comply with all applicable laws and regulations.

Compliance Officer

SFCT's Compliance Officer is the Treasurer and is responsible for investigating and resolving all reported complaints and allegations concerning violations of the Whistleblower Policy and, at his or her discretion, shall advise the Executive Director and/or the Finance Committee. The Compliance Officer has direct access to the Finance Committee of the Board of Directors and is required to report to the Finance Committee at least annually on compliance activity.

Reporting Responsibility

It is the responsibility of all directors, officers and employees to comply with, and to report violations or suspected violations, in accordance with this Policy.

No Retaliation

No director, officer or employee who in good faith reports a violation of this Policy shall suffer harassment, retaliation or adverse employment consequence. An employee who retaliates against someone who has reported a violation in good faith is subject to discipline up to and including termination of employment. This Whistleblower Policy is intended to encourage and enable employees and others to raise serious concerns within SFCT prior to seeking resolution outside SFCT.

Reporting Violations

The Policy addresses SFCT's open door policy and suggests that employees share their questions, concerns, suggestions or complaints with someone who can address them properly. In most cases, an employee's supervisor is in the best position to address an area of concern. However, if the employee is not comfortable speaking with his or her supervisor, or is not satisfied with the supervisor's response, the employee is encouraged to speak with the Executive Director, or if it involved the Executive Director, report to the Compliance Officer. Supervisors and managers are required to report suspected violations of this Policy to SFCT's Compliance Officer, who has specific and exclusive responsibility to investigate all reported violations. For suspected fraud, or when one is not satisfied or uncomfortable with following SFCT's open door policy, that individual should contact SFCT's Compliance Officer directly.

Accounting and Auditing Matters

The Finance Committee of the Board of Directors shall address all reported concerns or complaints regarding corporate accounting practices, internal controls or auditing. The Compliance Officer shall immediately notify the Finance Committee of any such complaint and work with the committee until the matter is resolved.

Acting in Good Faith

Anyone filing a complaint concerning a violation or suspected violation of the Whistleblower Policy must be acting in good faith and have reasonable grounds for believing the information disclosed indicates a violation of the Policy. Any allegations that prove not to be substantiated and which prove to have been made maliciously or knowingly to be false will be viewed as a serious disciplinary offense.

Confidentiality

Violations or suspected violations may be submitted on a confidential basis by the complainant or may be submitted anonymously. Reports of violations or suspected violations will be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation.

Handling of Reported Violations

The Compliance Officer will notify the sender and acknowledge receipt of the reported violation or suspected violation within five business days. All reports will be promptly investigated, and appropriate corrective action will be taken if warranted by the investigation.



Secretary

12-4-17

Date

