

**Rutland West Neighborhood Housing Services, Inc.
d/b/a NeighborWorks® of Western Vermont**

Confidentiality Policy

The purpose of the confidentiality policy is to protect Rutland West Neighborhood Housing Services, Inc, d/b/a NeighborWorks® of Western Vermont (NWWVT), and customer data.

In order to fulfill our funder requirements, significant amounts of data often must be revealed to organizational personnel and volunteers. The customer must be assured that the information shared with any NWWVT employee, director, principal, officer, board member or member of a committee will remain confidential. A breach in confidentiality, may result in the customer withholding critical information which could affect their eligibility and our funding sources could be jeopardized. This policy is intended to supplement but not replace any applicable Federal, state or local laws governing confidentiality applicable to nonprofit and charitable corporations.

NWWVT maintains a strict policy of confidentiality to safeguard the privacy of each customer. Access to customer information is permitted on a need-to-know basis.

Violations of this policy include, but are not limited to:

- The release of data to unauthorized users,
- Accessing information that is not within the scope of one's job, and/or
- Misusing, disclosing without proper authorization, or altering customer information.

NWWVT employee director, principal, officer, board member or volunteer member of a committee will be informed about the confidentiality of customer information to which access has been permitted in the normal course of business, as well as the customer data use and purpose, and will understand and accept responsibility to preserve the confidentiality of customer information or organizational data.

Annual Statements

Each director, principal officer and member of a committee with board delegated powers, as well as all employees and volunteers with NWWVT, shall annually sign a statement which affirms that such person (a) has received a copy of the Confidentiality Policy, (b) has read and understands the policy, (c) has agreed to comply with the policy, and (d) understands that NWWVT is a charitable organization and that in order to maintain its federal tax exemption, it must engage primarily in activities which accomplish one or more of its tax-exempt purposes.

Failure to comply with this policy is a violation of ones' duties as board or committee member.

Employees of NWWVT are subject to the terms of the employee handbook.

Periodic Reviews

To ensure that NWWVT operates in a manner consistent with its charitable purposes and that it does not engage in activities that could jeopardize its status as an organization exempt from federal income tax, periodic reviews of the Conflicts of Interest Policy and requirements shall be conducted.

Confidentiality Policy Agreement

I, _____, have received a copy of the Rutland West Neighborhood Housing Services, Inc., d/b/a NeighborWorks® of Western Vermont (NWWVT), Confidentiality Policy.

I have read and understand the Confidentiality Policy.

I agree to comply with the Confidentiality Policy.

I understand that NWWVT is a charitable organization with federal tax-exempt status and that NWWVT must engage primarily in activities that accomplish its tax-exempt purpose(s).

Signed: _____ Date: _____

Printed Name: _____

**Rutland West Neighborhood Housing Services, Inc.
d/b/a NeighborWorks® of Western Vermont**

Conflict of Interest Policy

The purpose of the Conflict of Interest Policy is to protect the interest of Rutland West Neighborhood Housing Services, Inc, d/b/a NeighborWorks® of Western Vermont (NWWVT) when it is contemplating entering into a transaction or arrangement that might benefit the private interest of an officer or director of NWWVT. This policy is intended to supplement but not replace any applicable Federal, state or local laws governing conflicts of interest applicable to nonprofit and charitable corporations.

Interested Person

Any employee, director, principal, officer, or member of a committee with board delegated powers, who has a direct or indirect financial interest, as defined below, is an Interested Person.

Financial Interest

A person has a Financial Interest if the person has, directly or indirectly, through business investment or family – (a) an ownership or investment interest in any entity with which NWWVT has a transaction or arrangement, (b) a compensation arrangement with NWWVT or with any entity or individual with which the Corporation has a transaction or arrangement, or (c) a potential ownership or investment interest in, or compensation arrangement with any entity or individual with which NWWVT is negotiating a transaction or arrangement. Compensation includes direct and indirect remuneration as well as gifts or favors that are substantial in nature.

A Financial Interest is not necessarily a conflict of interest. A person who has a Financial Interest may have a conflict of interest only if the appropriate board or committee decided that a conflict of interest exists.

Duty to Disclose

In connection with any actual or possible conflict of interest, an Interested Person must disclose the existence and nature of his/her Financial Interest and must be given the opportunity to disclose all material facts to the directors (or members of the appropriate committee with board delegated power) considering the proposed transaction or undertaking.

Determining Whether a Conflict of Interest Exists

After disclosure of the Financial Interest and all material facts, and after any discussion with the Interested Person, if a board or committee member, the board or committee member shall leave the board or committee meeting while the determination of a conflict of interest is discussed and voted upon. After exercising due diligence, the board or committee, if appropriate, shall determine whether NWWVT can obtain a more advantageous transaction or arrangement with reasonable efforts from a person or entity that would not give rise to a conflict of interest. If a more advantageous transaction or arrangement is not reasonably attainable under circumstances that would not give rise to a conflict of interest, the board or committee shall determine by majority vote of the disinterested directors, if board or committee member is the Interested Person, whether the transaction or arrangement is in NWWVT's best interest and for its benefit and whether the transaction is fair and reasonable to NWWVT, and shall make its decision as to whether to enter into the transaction arrangement in conformity with such determination. The minutes of the board and all committees with board-delegated powers shall record the names of all persons participating in the meeting, a summary of the discussion, including and proposed alternative arrangements, and a record of any votes taken in connection with the final determination.

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Periodic Reviews

To ensure that NWWVT operates in a manner consistent with its charitable purposes and that it does not engage in activities that could jeopardize its status as an organization exempt from federal income tax, periodic reviews of the Conflicts of Interest Policy and requirements shall be conducted.

Conflict of Interest Policy Statement Agreement

Developed 1/27/2007, Amended 1/6/22

I, _____, have received a copy of the Rutland West Neighborhood Housing Services, Inc., d/b/a NeighborWorks® of Western Vermont (NWWVT), Conflict of Interest Policy.

I have read and understand the Conflict of Interest Policy.

I agree to comply with the Conflict of Interest Policy.

I understand that NWWVT is a charitable organization with federal tax-exempt status and that NWWVT must engage primarily in activities that accomplish its tax-exempt purpose(s).

Disclosures:

Signed: _____ Date: _____

Printed Name: _____

**Rutland West Neighborhood Housing Services, Inc.
d/b/a NeighborWorks® of Western Vermont**

Whistleblower Policy

The purpose of the whistleblower policy is to protect Rutland West Neighborhood Housing Services, Inc, d/b/a NeighborWorks® of Western Vermont (NWWVT) by encouraging staff and volunteers to come forward with credible information in illegal practices or violations of adopted policies of the organization, specifies that the organization will protect the individual from retaliation, and identifies those staff or board members or outside parties to whom such information can be reported (Instructions from IRS Form 990). This policy is intended to supplement but not replace any applicable Federal, state or local laws governing conflicts of interest applicable to nonprofit and charitable corporations.

General

Rutland West Neighborhood Housing Services, Inc. d/b/a/ NeighborWorks of Western Vermont requires directors, officers, employees and volunteers to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. As employees and representatives of NWWVT, we must practice honesty and integrity in fulfilling our responsibilities and comply with all applicable laws and regulations.

Definition

A whistleblower as defined by this policy is an employee of NeighborWorks of Western Vermont who reports an organization activity or practice that the employee considers to be illegal or dishonest. The employee shall report to one or more of the parties specified in this policy. The whistleblower is not responsible for investigating the activity or for determining fault or corrective measures; appropriate management officials are charged with these responsibilities.

Examples

Examples of illegal or dishonest activities are violations of federal, state or local laws; billing for services not performed or for goods not delivered; and other fraudulent financial reporting.

Developed 1/27/2007, Amended 6/9/18, Amended 1/6/22

If an employee has knowledge of or a concern of illegal or dishonest fraudulent activity, the employee is to contact his/her immediate supervisor or the Human Resources Director. The employee must exercise sound judgment to avoid baseless allegations. An employee who intentionally files a false report of wrongdoing will be subject to discipline up to and including termination.

Whistleblower protections

Whistleblower protections are provided in two important areas -- confidentiality and against retaliation. Insofar as possible, the confidentiality of the whistleblower will be maintained. However, identity may have to be disclosed to conduct a thorough investigation, to comply with the law and to provide accused individuals their legal rights of defense. The Company will not retaliate against a whistleblower. This includes, but is not limited to, protection from retaliation in the form of an adverse employment action such as termination, compensation decreases, or poor work assignments and threats of physical harm. Any whistleblower who believes he/she is being retaliated against must contact the Human Resources Director immediately. The right of a whistleblower for protection against retaliation does not include immunity for any personal wrongdoing that is alleged and investigated.

Reporting Responsibility

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

No Retaliation

No director, officer, employee or volunteer who in good faith reports a violation 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 the Organization prior to seeking resolution outside the Organization.

Reporting Violations

NWWVT's open-door policy suggests that employees share their question, 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 you

are not comfortable speaking with your supervisor or you are not satisfied with your supervisor's response, you are encouraged to speak with someone in the Human Resources Department or anyone in management whom you are comfortable in approaching. Supervisors and managers are required to report suspected violations to the Compliance Officer, who has a specific and exclusive responsibility to investigate all reported violations. For suspected fraud, or when you are not satisfied or uncomfortable with following the Organization's open-door policy, individuals should contact NWWT's Compliance Officer directly.

Compliance Officer

NWWT's Compliance Officer, Melanie Paskevich, is responsible for ensuring that all complaints about unethical or illegal conduct are investigated and resolved. The Compliance Officer will advise the Executive Director and/or the Board of Directors of all complaints and their resolution and will report at least annually to the Chair of the Finance and Audit Committee on compliance activity relating to compliance activities.

Accounting and Auditing Matters

The audit 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 audit 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 must be acting in good faith and have reasonable grounds for believing the information disclosed indicates a violation. 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.

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Printed Name: _____