

Memo

To: www.YMCA.org Website Users
From: Paul C. Sullivan, EVP & CFO/Operations
Date: 7/6/2012
Re: YMCA Whistleblower Policy

In the YMCA of San Diego County safety, quality and accountability are hallmarks of our work. We strive to provide excellent service to the community through high quality safe and enjoyable programs and facilities. In order to continue this excellent service, we rely on our staff, volunteers, members, participants and guests to help us make sure that we live up to the four core values we teach in our programs - Caring, Honesty, Respect and Responsibility – and our mission: The YMCA of San Diego County is dedicated to improving the quality of human life and to helping all people realized their fullest potential as children of God through the development of the sprit, mind and body. All YMCA staff, board members, volunteers, programs & other interactions with members/participants/guests, business transactions, fund raising solicitations, vendor relations, events, etc. are subject to this mission and the four core values.

The attached Whistleblower Protection Policy was adopted by our Board of Directors several years ago, in compliance with State and Federal laws. Generally, the policy is intended to provide a mechanism for anyone to report concerns regarding issues in the YMCA of San Diego County that management and/or the Board of Directors should be aware of and investigate for corrective action. The Policy also assures whistleblowers that absolutely no retaliation against them will be tolerated.

While the policy specifically identifies YMCA SVP/General Counsel and YMCA Audit Committee Chair as the persons who should be contacted by individuals making a Whistleblower report, a whistleblower may also make their report using the “contact us” section of this website and it will be forwarded to the appropriate person for investigation. In order to do a full and complete investigation we ask that you keep the following points in mind when filing a report:

- We need a clear and concise statement of what you believe is improper, why you believe it is improper and what evidence you believe confirms this belief.

- Please provide all the facts, including the name(s) or other information that clearly identifies the person(s) that you believe acted improperly and any witnesses or evidence you think might assist us in our investigation.
- You may submit your report anonymously, however, if you do so realize that we may not be able to communicate with you to clarify your report or to inform you of corrective actions taken.

After we receive a whistleblower report, any resulting investigation is confidential, so the YMCA staff cannot provide updates about what is being done to investigate the report or any information gathered as a result of the investigation. Information will not be released until a final report is issued by the YMCA.

My e-mail address is psullivan@ymca.org. Feel free to contact me if you have any questions or concerns about this policy.

Thank you for helping us stay safe and accountable.

YMCA Whistle Blower Policy Below

POLICY
FILE

PROCEDURE

STANDARD

REFERENCE

BULLETIN 2.700

ADMINISTRATIVE MANUAL – YMCA OF SAN DIEGO COUNTY

DATE 6/18/08 SOURCE CFO & Audit Committee

REVISED 5/31/12 -

Whistleblower Protection Policy and Reporting Procedure

Employees, volunteers, board members, and Officers of the YMCA of San Diego County must report any dishonest, illegal unethical or undisclosed conflict of interest conduct in connection with the YMCA's operation, resources or finances. This whistleblower protection policy and reporting procedure is intended to encourage and enable employees and others to raise concerns within the YMCA prior to seeking resolution outside the YMCA.

Scope:

This policy covers complaints made regarding the YMCA's operation, resources or finances. Listed below are examples of allegations that constitute reportable Whistleblower Policy violations. This list is not intended to be all inclusive.

- Misappropriation of YMCA assets
- Improper recording and/or stating of financial reporting or reports
- Unauthorized and/or improper disclosure of YMCA information, such as employee, participant, marketing and other sensitive data
- Falsification of records consisting of altering, fabricating, falsifying, or forging all or any part of a document, contract or record
- The act of stealing
- Undisclosed conflict of interest

This policy, is in addition to, and separate from, the YMCA's policies on Code of Conduct & Ethics and on Equal Employment Opportunity, including the Policy

Against Harassment, in the YMCA's Personnel Policy Manual. Mechanisms for resolving such issues are addressed in separate procedures.

Reporting Procedure:

Employees, volunteers, board members and officers of the YMCA of San Diego County may report violations, either anonymously or not, to either the Senior Vice President Risk Management & General Counsel or to the Chair of the Audit Committee (who is a member of the YMCA Board of Directors independent from staff). Such reports may be made in writing, in person, or through e-mail.

The Senior Vice President Risk Management & General Counsel or the Audit Committee Chair is responsible for investigating and resolving all reported complaints and allegations regarding violations and, at their discretion, advising the Audit Committee and/or Board of Directors. All reported incidents shall be logged by the Chief Financial Officer.

Contact information for making reports

<u>INTERNAL REPORTS</u>	<u>AUDIT COMMITTEE CHAIR</u>
Bernie Porter SVP Risk Management & General Counsel YMCA of San Diego County 3708 Ruffin Road San Diego, CA 92123 bporter@ymca.org 858-292-9622	Thomas E. Darcy Chief Financial Officer Tocagen, Inc. 12230 El Camino Real, Suite 300 San Diego, CA 92130 tdarcy@tocagen.com 858-412-8403

No Retaliation:

Any individual who in good faith reports a violation must not be penalized, harassed, retaliated against or made to suffer adverse consequences of any kind as a result of making such a report. Any employee who retaliates against someone who has made such a report is subject to discipline up to and including termination of employment. Likewise, the YMCA may terminate its relationship with any volunteer who retaliates against a whistleblower.

Any individual who deliberately or maliciously provides false information may be subject to disciplinary action and/or prosecution.