

105.4 Whistleblower Policy and Protection

Community Action Project of Tulsa County, Inc. (“CAP Tulsa”) is committed to facilitating open and honest communications relevant to its governance, finances, and compliance with all applicable laws and regulations. It is important that CAP Tulsa be apprised about unlawful or improper behavior including, but not limited to any of the following conduct:

- 1) theft;
- 2) financial reporting that is intentionally misleading;
- 3) improper or undocumented financial transactions;
- 4) improper destruction of records;
- 5) improper use of assets;
- 6) violations of CAP Tulsa’s conflict-of-interest policy; and
- 7) any other improper occurrence regarding cash, financial procedure or reporting.

We request the assistance of anyone who has a reasonable belief or suspicion about any improper transaction. CAP Tulsa values this input and each director, employee, or volunteer should feel free to raise issue of concern, in good faith, without fear of retaliation. No one will be disciplined, demoted, lose their jobs, or be retaliated against for asking questions or voicing concerns about conduct of this sort. At the same time, CAP Tulsa expects all to take this policy seriously, to use it in good faith, and to use it when necessary and in a judicious manner. Reports that are not made in good faith, or is intended to harass or annoy an employee, may result in disciplinary action, including termination.

Making a Report: We encourage anyone who has reasonable knowledge regarding CAP Tulsa’s governance, finances, or compliance with all applicable laws and regulations to report the concern by telephone or electronic mail, at their preference:

Electronic Mail: whistle@fulcrum.com

By Internet: www.fulcrum.com/cap.htm

Anonymous telephone number: 213-596-1902*

*You can reverse the call charges if desired, using the company name to remain anonymous.

Fax: 213-891-1300