

PROCEDURE:

Reporting

The whistleblowing procedure is intended to be used for serious and sensitive issues. Serious concerns relating to financial reporting, unethical or illegal conduct, should be reported in either of the following ways:

- Through the Toll Free Hotline: 800-398-1496 (English) 800-216-1288 (Spanish)
- E-mail: <mailto:reports@lighthouse-services.com>
- Fax alternative for written documents: 215-689-3885
- Web: lighthouse-services.com (click on Submit Report link). Username: **WELS** and Password: **whistleblower**

Callers to the Hotline will have the ability to remain anonymous if they choose. Please note that the information provided by you may be the basis of an internal and/or external investigation into the issue you are reporting and your anonymity will be protected to the extent possible by law. However, your identity may become known during the course of the investigation. Complaints are submitted by Lighthouse to the Synod or its designee, and may or may not be investigated at the sole discretion of the Synod.

Employment-related concerns should continue to be reported through your normal channels such as your supervisor, local HR representative, or to the WELS Director of Human Resources Officer (414-256-3268).

Timing

The earlier a concern is expressed, the easier it is to take action.

Evidence

Although the employee is not expected to prove the truth of an allegation, the employee need to demonstrate to the person contacted that there are sufficient grounds for concern.

HOW THE COMPLAINT WILL BE HANDLED:

The action taken will depend on the nature of the concern. The Accounting Oversight committee of the Synod receives a report on each complaint and a follow-up report on actions taken.

Initial Inquiries

Initial inquiries may be made to determine whether an investigation is appropriate, and the form that it should take. Some concerns may be resolved by agreed action without the need for investigation.

Report to Complainant

Whether reported to the Chairman of the Accounting Oversight Committee or through the hotline, the complainant will be given the opportunity to receive follow-up on their concern:

- Acknowledging that the concern was received;
- Indicating how the matter will be dealt with;
- Giving an estimate of the time that it will take for a final response;
- Telling them whether initial inquiries have been made;
- Telling them whether further investigations will follow, and if not, why not.

Further Information

The amount of contact between the complainant and the body investigating the concern will depend on the nature of the issue, the clarity of information provided, and whether the complainant remains accessible for follow-up. Further information may be sought from the complainant.

Information

Subject to legal constraints the complainant will receive information about the outcome of any investigations. *The Synod reserves the right to modify or amend the policy at any time as it may deem necessary.*