

THE LAND TRUST FOR SANTA BARBARA COUNTY

Whistleblower Policy

(Approved by the Board of Trustees November 11, 2006)

The Land Trust for Santa Barbara County requires trustees, other volunteers, and employees to observe high standards of business and personal ethics in the conduct of their duties and responsibilities and has established this Whistleblower Policy. Employees and representatives of the organization must practice honesty and integrity in fulfilling their responsibilities and comply with all applicable laws and regulations.

The objectives of the Land Trust's Whistleblower Policy are to establish policies and procedures for:

- The submission of concerns regarding questionable accounting or auditing matters by employees, trustees, officers, and other stakeholders of the organization, on a confidential and anonymous basis.
- The receipt, retention, and treatment of complaints received by the organization regarding accounting, internal controls, or auditing matters.
- The protection of trustees, volunteers and employees reporting concerns from retaliatory actions.

Reporting Responsibility

Each trustee, volunteer, and employee of Land Trust is encouraged to report, in accordance with this Whistleblower Policy, any known or suspected questionable, or improper ethical, accounting, internal control, or auditing matter ("Concern" or "Concerns").

Authority of Audit Committee

All reported Concerns shall be forwarded to the Audit Committee in accordance with the procedures set forth herein. The Audit Committee shall be responsible for investigating, and making appropriate recommendations to the Board of Trustees, with respect to all reported Concerns.

No Retaliation

This Whistleblower Policy is intended to encourage and enable trustees, volunteers, and employees to raise good faith Concerns within the organization for investigation and appropriate action. With this goal in mind, no trustee, volunteer, or employee who, in good faith, reports a Concern shall be subject to retaliation or, in the case of an employee, adverse employment consequences. Moreover, a volunteer or employee who retaliates against someone who has reported a Concern in good faith and with reasonable belief in the truth of the Concern is subject to discipline up to and including dismissal from the volunteer position or termination of employment.

How to Report Concerns

Employees should first discuss their Concern with their immediate supervisor. If, after speaking with his or her supervisor, the individual continues to have reasonable grounds to believe the Concern is valid, the individual should report the Concern to the Executive

Director. In addition, if the individual is uncomfortable speaking with his or her supervisor or with the Executive Director, or the supervisor or Executive Director is a subject of the Concern, the individual should report his or her Concern directly to either the Chair of the Board of Trustees or to the Chair of the Audit Committee.

If the Concern was reported verbally, the person to whom the report was made is required to promptly report the Concern to the Chair of the Audit Committee, who has the specific responsibility, with the other Audit Committee members to investigate all Concerns. If the person(s) to whom the report was made, for any reason, does not promptly forward the Concern to a member of the Audit Committee, the reporting individual should directly report the Concern to the Chair of the Audit Committee.

The Executive Director will distribute annually to all current trustees, employees and volunteers a copy of this policy and the name and contact information for current members of the Audit Committee. Concerns may also be submitted anonymously. Such anonymous Concerns should be in writing and sent directly to the Chair of the Audit Committee at the address specified above.

Acting in Good Faith

Anyone reporting a Concern must act in good faith and have reasonable grounds for believing the information disclosed indicates an improper accounting or auditing practice. The act of making allegations that are determined by the Land Trust to have been made maliciously, recklessly, or with the foreknowledge that the allegations are false will be viewed as a serious disciplinary offense and may result in discipline, up to and including dismissal from the volunteer position or termination of employment. Such conduct may also give rise to other actions, including civil lawsuits.

Confidentiality

Reports of Concerns, and investigations pertaining thereto, shall be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation.