

WHISTLEBLOWER POLICY

We require our directors, employees and volunteers to practice the highest levels of business and personal ethics when conducting their duties and responsibilities. This means that employees and other representatives of our organization must practice honesty and integrity in their job duties and comply with all applicable laws and regulations. The objectives of this Whistleblower Policy are to establish policies and procedures for:

- The submission of concerns regarding questionable accounting or auditing matters by employees, directors, officers or any other interested party, on a confidential and anonymous basis.
- The receipt, retention, and treatment of complaints received by our organization regarding accounting, internal controls, or auditing matters.
- The protection of reporters from retaliatory actions.

How to Report:

An employee or other representative of our organization may choose to report a concern to either a supervisor, manager, the Executive Director, a board member or the Board Chair, as appropriate.

Handling of the Reported Concern:

After a report is made it should be immediately conveyed to the Board Chair. The Board Chair shall immediately notify the Board and the Executive Director of any such report but is not required to notify a specific board member or the Executive Director if the concern(s) directly involve(s) any of these individuals. The Board Chair will notify

the sender and acknowledge receipt of the concern within ten business days, if possible. It will not be possible to acknowledge receipt of anonymously submitted concerns.

All reports will be promptly investigated by a Special Task Force appointed by the Board Chair, and appropriate corrective action will be taken, if warranted by the investigation. In addition, action taken must include a conclusion and/or follow-up with the complainant for complete closure of the concern. The investigation, corrective action, and conclusion shall be documented in a written summary and preserved indefinitely.

The Board of Directors has the authority to retain outside legal counsel, accountants, private investigators, or any other resource deemed necessary to conduct a full and complete investigation of the allegations.

Confidentiality

Reports of concerns and investigations pertaining thereto shall be kept confidential to the extent possible. However, the reporter's identity may have to be disclosed to conduct a thorough investigation, to comply with the law and to assure accused individuals their legal rights to defend.

No Retaliation

This Whistleblower Policy is intended to encourage and enable directors, employees and volunteers to raise concerns within our organization for investigation and appropriate action. With this goal in mind, no director, employee or volunteer who, in good faith, reports a concern shall be subject to retaliation or adverse employment action. Any person who so retaliates will be subject to disciplinary action, including termination.

Likewise, an individual who reports a concern who is not acting in good faith, does not have reasonable grounds for believing the information disclosed indicates an improper accounting or auditing practice, or who makes unsubstantiated allegations that prove to have been made maliciously, recklessly, or with the foreknowledge that the allegations are false, may be subject to disciplinary action, including termination.