

# WHISTLEBLOWER POLICY

This corporation seeks to conduct all of its activities in a responsible, legal and ethical manner. All officers, directors, employees and volunteers of this corporation must practice integrity and honesty in fulfilling their responsibilities and must comply with all applicable laws and regulations. The purpose of this Whistleblower Policy is to provide a mechanism to report irresponsible, illegal or unethical behavior.

## Whistleblower Complaints

If an officer, director, employee or volunteer should discover information leading him or her to believe that a serious wrongdoing or illegal or unethical behavior has occurred in this corporation, he or she shall report this information to the President of the Board. If the President of the Board is not available or is implicated in the wrongdoing, he or she shall report the information to another Board officer.

The President or Board officer shall conduct an investigation. Reports of violations will be kept confidential to the extent possible, consistent with the need to conduct an investigation. Appropriate corrective action will be taken if warranted by the investigation.

## No Retaliation

1. The corporation's policy is to protect from retaliation and discrimination any person who in good faith:

(a) refused to participate in any federal, state or local offense; reported to law enforcement or other officials any information that the person believed to be evidence relating to the commission or possible commission of any federal, state or local offense; or initiated, testified or aided in proceedings related to the above.

(b) initiated or aided in civil proceedings;

(c) refused to engage in a violation of a governmental administrative regulation; reported any information related to a violation of governmental administrative regulations; commenced, testified at, aided or participated in a governmental adjudicatory proceeding;

(d) refused to engage in or attempted to stop fraud against, gross waste of or abuse of authority by the government; or

(e) reported other information about wrongdoing, illegal or unethical behavior pursuant to this Policy.

An officer, director, employee, or volunteer of this corporation shall not, with intent to retaliate or discriminate, take any action harmful to any person described above, including interference with the lawful employment or livelihood of any person.

2. In the event that an officer, director, employee, or volunteer intends, for any reason, to take any action harmful to any person who has acted as described above, the officer, director, employee, or volunteer must obtain the approval for such action from the Board of Directors prior to taking action. Such approvals must be obtained even if the officer, director, employee, or volunteer believes that the person who provided information to the law enforcement officer or other official provided untruthful information.

ADOPTED: August 21, 2020