

## **WHISTLEBLOWER PROTECTION POLICY**

The Foundation is committed to the highest ethical and professional standards. To ensure our organization's ability to continue to adhere to these standards, we have adopted the following "Whistleblower Protection Policy."

### **Policy Statement**

The management and staff of the Foundation are committed to sound financial, operating, and ethical and private foundation management standards and practices. As such, the Foundation staff must comply with and frequently go beyond the laws and regulations applicable to private foundations and must faithfully implement the Foundation's own policies and procedures. This is particularly true with regard to matters and controls that affect the Foundation finances, audits and governance. For these purposes, all individuals associated with the Foundation have the responsibility to report any circumstances that they have actual knowledge of, or a reasonable good faith belief that, the Foundation's internal controls, accounting and operating systems, or governance policies are compromised or threatened. The Foundation will not tolerate retaliation, whether direct or indirect, against any person who makes a good faith report. However, the Foundation may take disciplinary action, up to and including termination, against a person who has committed an offense even though he or she has cooperated with the investigation, or against an individual who files a complaint without having a reasonable good faith belief in the truth of the reported matters.

### **Formal Process**

#### ***Notification***

Any employee who has any concern regarding the financial and/or operating transactions, processes or environment of the Foundation should immediately bring such issue to the attention of his or her supervisor. If this does not appear to be feasible (e.g., the supervisor is involved in the circumstances giving rise to the concern), the employee may bring such complaint to the President. If this is not feasible, the complaint should be addressed to the Board of Trustees. The Board of Trustees has designated the Chair of the Audit Committee to review complaints directed to the Board

#### ***Follow-up***

To the extent possible, all contacts will be held in the strictest confidence. The employee will receive notification of the status of the investigation within 30 days from the President. Thereafter, the employee will receive a periodic status update until the issue has been resolved.