



# Hopegivers International, Inc. Whistle Blower Policy

General Hopegivers International's policies require directors, other volunteers, and employees to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. Employees and representatives of the organization must practice honesty and integrity in fulfilling their responsibilities and comply with all applicable laws, regulations and internal controls established by the organization. The objective of the Hopegivers International's (HGI) Whistleblower Policy is to establish policies and procedures for: The submission of concerns regarding questionable accounting or audit matters by employees, directors, officers, and other stakeholders of the organization, on a confidential and anonymous basis. Receipt, retention, and treatment of complaints received by the organization regarding accounting, internal controls, or auditing matters. Protection of directors, volunteers and employees reporting concerns from retaliatory actions.

Each director, volunteer, and employee of HGI has an obligation to report in accordance with this Whistleblower Policy questionable or improper accounting or auditing matters. All reported Concerns will be forwarded to the Committee (a three member team made up of members of the Board of Trustees) in accordance with the procedures set forth herein. The Committee shall be responsible for investigating, and making appropriate recommendations to the Board of Trustees, with respect to all reported Concerns.

This Whistleblower Policy is intended to encourage and enable directors, volunteers, and employees to raise Concerns within the Organization for investigation and appropriate action. With this goal in mind, no director, 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 is subject to discipline up to and including dismissal from the volunteer position or termination of employment.

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 Chief Operations Officer/ HR Manager. In addition, if the individual is uncomfortable speaking with his or her supervisor, or the supervisor is a subject of the Concern, the individual should report his or her Concern directly to another member of management.

The Concern should be reduced to writing and forwarded at the earliest opportunity to the Chair of the Committee. Contact information for the Chair of the Committee may be obtained from the President & CEO or, if the President & CEO is the subject of the concern, then directly from another member of the management team. Concerns may also be submitted anonymously. Such



anonymous Concerns should be in writing and sent directly to the Chair of the Committee.

Directors and other volunteers should submit Concerns in writing directly to the Chair of the Committee. Contact information for the Chair of the Committee may be obtained from the President & CEO.

The Committee shall address all reported Concerns. The Chair of the Committee shall immediately notify the Committee, the Board Chair, the President & CEO, and the Vice President of Marketing & Chief Financial Officer of any such report (unless one of them is the subject of the concern). The Chair of the Committee will notify the sender and acknowledge receipt of the Concern within five business days, if possible. It will not be possible to acknowledge receipt of anonymously submitted Concerns. All

reports will be promptly investigated by the Committee, and appropriate corrective action will be recommended to the Board of Trustees, 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 Committee 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.

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, or a violation of the Policies. The act of making allegations that prove to be unsubstantiated, and that prove 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.

Reports of Concerns, and investigations pertaining thereto, shall be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation. Disclosure of reports of Concerns to individuals not involved in the investigation will be viewed as a serious disciplinary offense and may result in discipline, up to and including termination of employment.