

# **WHISTLEBLOWER POLICY OF THE NEAL PEIRCE FOUNDATION**

Adopted by the Board of Directors as of September 29, 2020

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## **Introduction**

The Neal Peirce Foundation (the “*Corporation*”) is committed to the highest standards of ethical conduct. Given the Corporation’s mission and responsibilities, all employees, officers and directors have an obligation to preserve the organization’s reputation and standing, in our community and beyond, to uphold the public trust and to act in an ethical and lawful manner. The Corporation requires its employees, officers and directors to observe high standards of business and personal ethics, and to comply with all applicable laws and regulations, in the conduct of their duties and responsibilities for the organization. The Corporation’s reputation for acting in accordance with the highest standards of ethical conduct is one of its most valuable assets. The assistance of all employees, officers and directors in preserving this asset is both expected and sincerely appreciated.

## **The Whistleblower Policy**

As part of its overall commitment to the highest standards of ethical conduct, the Corporation has established a Whistleblower Policy (this “*Policy*”). This Policy has been developed and implemented to encourage the Corporation’s employees, officers and directors and members of the public to make good faith reports of possible violations of law or infractions of rules or organizational policies by the Corporation or any of its employees, officers or directors, and to raise any concerns they may have about such matters, confidentially and without fear of retaliation, within the Corporation prior to seeking a resolution outside the organization.

Types of matters that should be reported under the Whistleblower Policy include suspected fraud, theft, embezzlement, accounting or auditing irregularities, bribery, kickbacks, abuse or misuse of the Corporation’s resources or assets, conflicts of interest, or suspected compliance or ethics-related issues, concerns or violations.

The Whistleblower Policy reporting mechanisms may also be used to report human resources issues, personal problems with co-workers or managers, or matters of workplace discrimination or harassment.

## **Confidentiality and Non-Retaliation**

In order to encourage individuals to come forward with any good faith report of suspected illegal or unethical behavior on the part of any Corporation employee, officer or director, all reports made under the Whistleblower Policy will be treated as confidential to the utmost extent possible. Reports may also be made anonymously, as described below.

Moreover, no person who makes a good faith report of a complaint, concern or suspected misconduct under the Whistleblower Policy may be subject to any form of retaliation, harassment or adverse employment action. It is prohibited to discriminate against complainants for making good faith reports in any of the terms and conditions of their employment, including but not limited to job assignment, promotion, compensation, training, discipline and termination. Any employee who engages in any such retaliatory action is subject to serious disciplinary action, including possible termination of employment. Any suspected acts of retaliation should be reported immediately in accordance with the reporting process set forth below.

### **The Whistleblower Process**

Any person who makes a report pursuant to the Whistleblower Policy will be treated with dignity and respect. Two persons have been designated as primary contacts to receive reports of wrongdoing under this Whistleblower Policy: the Chairperson of the Corporation's Board of Directors and another designated member of the Corporation's Board of Directors. The Chairman, Andrea Peirce, may be reached directly at 917-273-6463 or andreap.nyc@gmail.com. The designated member of the Corporation's Board of Directors is Christopher Swope, who may be reached directly at (646-853-5771) or cswope1@hotmail.com.

These designated individuals have specific responsibility for investigating and resolving all reported complaints and allegations expeditiously, and will promptly contact the complainant to acknowledge receipt of the reported concern. All reports will be promptly investigated to the extent possible and appropriate corrective action will be recommended to the Corporation's Board of Directors, as and if warranted by such investigation.

The Corporation will retain copies of all complaints, investigative reports, summaries of reports and other records relating to concerns and complaints in accordance with the organization's records retention policy.

### **Discipline**

Corporation personnel who violate applicable laws and regulations, who fail to observe high standards of business and personal ethics or who violate Corporation policies and procedures may be subject to disciplinary action, up to and including discharge.

### **No Rights Created**

This Policy is a statement of certain fundamental principles and key policies and procedures that govern the conduct of the Corporation's business. It is not intended to and does not create any rights in any employee, client, supplier, competitor, shareholder or any other person or entity. The Policy does not, in any way, constitute an employment contract or an assurance of continued employment.

## **Conclusion**

This Policy has been established as part of the Corporation's comprehensive effort to maintain the highest standards of ethical conduct. As described above, this Policy has been structured to encourage the Corporation's employees, officers and directors and members of the public to come forward and report, in good faith, confidentially, and without fear of reprisal, any suspected violations of law or organizational rules or policies by the Corporation or its employees, officers or directors.

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