



WHISTLE BLOWER POLICY

I. Purpose

The Foundation is committed to lawful and ethical behavior in all its activities and requires its trustees, employees, grants panel and committee members to conduct themselves in a manner that complies with all applicable laws and policies. Set forth below is the Foundation's policy with respect to whistleblower complaints regarding the Foundation's financial integrity.

II. Reporting

Trustees, grant panel and committee members, and employees who have a good faith complaint pertaining to: a) the dissipation of the Foundation's assets; b) the mishandling or misuse of funds; c) related party transactions; d) compliance with state and federal reporting requirements; e) overriding or circumventing of the Foundation's internal controls; f) private inurement; and g) fraud shall promptly advise the Chair of the Audit Committee*. Reports can be made verbally, in writing, or in person.

All records pertaining to any complaint that falls under this policy shall be retained by the Foundation for four (4) years from the date the complaint was filed with the Chair of the Audit Committee and shall be made available to the Attorney General upon request of the Attorney General.

III. Investigation

The Chair of the Audit Committee shall bring complaints under this policy to the full Audit Committee for investigation. If as a result of their investigation the Audit Committee discovers a problem, they shall promptly notify the Board of Trustees of the nature of the problem and recommend corrective action to be taken by the Board and/or staff to resolve the problem. The Board shall ensure that the problem is resolved in a timely and professional manner.

IV. Retaliation

The Foundation shall not retaliate against any employee who has filed a complaint under Section II of this policy with the Trustees, the Attorney General, or any other government agency.

The Foundation's Board of Trustees shall impose disciplinary measures, up to and including the termination, against anyone who threatens or retaliates against an employee under this policy.