

## **Child of this Culture Foundation Whistleblower Protection Policy**

### **February 2021**

Child of this Culture Foundation (COTC) requires directors, officers, committee members, volunteer staff and employees to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. As employees and representatives of COTC, one must practice honesty and integrity in fulfilling our responsibilities and comply with all applicable laws and regulations.

#### **Reporting Responsibility**

This Whistleblower Policy is intended to encourage and enable employees and others to raise serious concerns internally so that COTC can address and correct inappropriate conduct and actions. It is the responsibility of all board members, officers, employees and volunteers to report concerns about violations of COTC Ethics Policies or suspected violations of law or regulations that govern COTC operations.

#### **No Retaliation**

It is contrary to the values of COTC for anyone to retaliate against any board member, officer, employee, athlete or volunteer who, in good faith, reports an ethics violation, or a suspected violation of law, such as a complaint of discrimination, or suspected fraud, or suspected violation of any regulation governing the operations of COTC. To the extent possible, the confidentiality of the whistleblower will be maintained. However, identity may have to be disclosed to conduct a thorough investigation, to comply with the law and/or to provide accused individuals their legal rights of defense.

COTC will not retaliate against a whistleblower. This includes, but is not limited to, protection from retaliation in the form of an adverse employment action such as termination, compensation decreases, or poor work assignments and threats of physical harm. Any whistleblower that believes he or she is being retaliated against must contact the Ethics Officer immediately. The right of the whistleblower for protection against retaliation does not include immunity for any personal wrongdoing that is alleged and investigated.

#### **Reporting Procedure**

COTC has an open door policy and suggests that employees and volunteer staff share their questions, concerns, suggestions or complaints with their supervisor. If an individual is not comfortable speaking with their supervisor or is not satisfied with their supervisor's response, they are encouraged to speak with the CEO and/or the Ethics Officer. Supervisors and managers, Employees, and Volunteer Staff, are required to report complaints or concerns about suspected ethical and legal violations to the Ethics Hotline or Ethics website. The Ethics Officer and/or the CEO have the responsibility to investigate all reported complaints.

### **Accounting and Auditing Matters**

COTC Ethics Officer and/or CEO shall immediately notify the Audit Committee of any concerns or complaints regarding corporate accounting practices, internal controls or auditing and work with the committee until the matter is resolved.

### **Acting in Good Faith**

Anyone filing a complaint concerning a violation or suspected violation must be acting in good faith and have reasonable grounds for believing the information disclosed indicates a violation. Any allegations that prove not to be substantiated and which prove to have been made maliciously or knowingly to be false will be viewed as a serious disciplinary offense.

### **Confidentiality**

Violations or suspected violations may be submitted on a confidential basis by the complainant. Reports of violations or suspected violations will be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation.

### **Handling of Reported Violations**

COTC Ethics Officer or CEO will notify the person who submitted a complaint and acknowledge receipt of the reported violation or suspected violation. All reports will be promptly investigated and appropriate corrective action will be taken if warranted by the investigation.