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# Whistleblower Protection Policy

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The Segal Family Foundation, Inc. (the “Foundation”) requires directors, officers, employees, and volunteers to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. As employees and representatives of the Foundation, we 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 the Foundation 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 the Foundation’s code of ethics or suspected violations of laws or regulations that govern the Foundation’s operations.

## **No Retaliation**

It is contrary to the values of the Foundation for anyone to retaliate against any board member, officer, employee, or volunteer who in good faith reports an ethics violation, a suspected violation of law (such as a complaint of discrimination or suspected fraud), or a suspected violation of any regulation governing the operations of the Foundation. An employee who retaliates against someone who has reported a violation in good faith is subject to discipline up to and including termination of employment.

## **Reporting Procedure**

The Foundation has an open door policy and suggests that employees share their questions, concerns, suggestions, or complaints with their supervisor. If you are not comfortable speaking with your supervisor or you are not satisfied with your supervisor’s response, you are encouraged to speak with the Executive Director. Supervisors and managers are required to report complaints or concerns about suspected ethical and legal violations in writing to the Foundation’s Executive Director, who has the responsibility to investigate all reported complaints. Employees with concerns or complaints may also submit their concerns in writing directly to their supervisor or the Executive Director.

The Foundation’s Executive Director shall be responsible for ensuring that all complaints about unethical or illegal conduct are investigated and resolved. The Executive Director will advise the Board of Directors of all complaints and their resolution and will report at least annually to the Board of Directors on compliance activity relating to accounting or alleged financial improprieties.

### **Accounting and Auditing Matters**

The Foundation's Executive Director shall immediately notify the Board of Directors of any concerns or complaints regarding corporate accounting practices, internal controls, or auditing and shall work with the Board of Directors until the matter is resolved.

### **Acting in Good Faith**

Anyone filing a written 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 that 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**

The Foundation's Executive Director 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.

### **Compliance Officer**

The Foundation may, from time to time, name an individual other than the Executive Director to act as Compliance Officer. The Compliance Officer may be a board member or a third party designated by the organization to receive, investigate, and respond to complaints. The organization will, upon naming of a new Compliance Officer, notify all persons covered by this Whistleblower Policy.

### **Distribution**

A copy of this Policy will be distributed to all Foundation Persons and will be posted on the Foundation's website.

The Foundation reserves the right to amend and/or supplement this Policy at any time.