



## **Whistleblower Protection Policy**

Project Pink'd requires directors, officers, volunteers and employees to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. As representatives of Project Pink'd, 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 Project Pink'd 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 Project Pink'd's code of ethics or suspected violations of law or regulations that govern Project Pink'd's operations.

### **No Retaliation**

It is contrary to the values of Project Pink'd for anyone to retaliate against any board member, officer, employee 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 Project Pink'd. An employee/volunteer who retaliates against someone who has reported a violation in good faith is subject to discipline up to and including termination of employment/involvement.

### **Reporting Procedure**

Project Pink'd has an open door policy and suggests that employees/volunteers share their questions, concerns, suggestions or complaints with their Team Leader. If you are not comfortable speaking with your Team Leader or you are not satisfied with your Team Leader's response, you are encouraged to speak with the Project Pink'd Compliance Officer. Team Leaders are required to report complaints or concerns about suspected ethical and legal violations in writing to the Project Pink'd's Compliance Officer who has the responsibility to investigate all reported complaints. Employees/volunteers with concerns or complaints may also submit their concerns in writing directly to their Team Leader or the President or the organization's Compliance Officer.

### **Compliance Officer**

The Project Pink'd Compliance Officer is responsible for ensuring that all complaints about unethical or illegal conduct are investigated and resolved. The Compliance Officer 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 Project Pink'd Compliance Officer shall immediately notify the Treasurer and Board of Directors of any concerns or complaint 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 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 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**

The Project Pink'd's Compliance Officer 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 Compliance Officer is the Board Secretary which will receive, investigate and respond to complaints.