

Women Thrive Worldwide Whistle Blower Policy

Overview

As employees and representatives of Women Thrive Worldwide, we must practice honesty and integrity in fulfilling our responsibilities and comply with all applicable laws and regulations.

Women Thrive Worldwide is committed to maintaining a workplace where employees are free to raise good faith concerns regarding the organization's business practices. In order to provide a mechanism for employees to raise good faith concerns regarding suspected violations of law on the part of the Women Thrive Worldwide, to cooperate in an inquiry or investigation by a court, agency, law enforcement, or other governmental body, or to identify potential violations of Women Thrive Worldwide policy; and to protect employees who take such actions from retaliation, Women Thrive Worldwide has established a Whistleblower Policy.

Policy

An employee who wishes to report a suspected violation of law or Women Thrive Worldwide policy may do so confidentially by contacting the General Counsel. Women Thrive Worldwide expressly prohibits any form of retaliation, including harassment, intimidation, adverse employment actions, or any other form of retaliation, against employees who raise suspected violations of law, cooperate in inquiries or investigations, or identify potential violations of Women Thrive Worldwide policies. Any employee who engages in retaliation will be subject to discipline, up to and including termination.

Any employee who believes that he or she has been subjected to any form of retaliation as a result of reporting a suspected violation of law or policy should immediately report the retaliation to the employee's immediate supervisor, President, board Chair, or General Counsel.

Reports of suspected violations of law or policy and reports of retaliation will be investigated promptly and in a manner intended to protect confidentiality, consistent with a full and fair investigation. The Board will conduct or designate other internal or external parties to conduct the investigations. The investigating parties will notify the concerned individuals of their findings directly and prepare other reports as indicated by the circumstances. A summary of all such reports will be presented to the Board of Directors.

Procedure

These procedures relate to employee complaints regarding any questionable accounting or auditing matters, including, without limitation, the following:

- fraud or deliberate error in the recording and maintaining of financial records of Women Thrive Worldwide;
- deficiencies in or noncompliance with Women Thrive Worldwide's internal accounting controls;
- misrepresentation or false statement to or by a senior officer or accountant regarding a matter contained in the financial records, financial reports or audit reports of Women Thrive Worldwide; or

- deviation from full and fair reporting of the organization's financial condition.

Receipt of Employee Complaints

Employees with concerns regarding Accounting Matters may report their concerns to the Board Chair or Treasurer. Employees may forward any complaints in person, by regular mail, or by fax. Women Thrive Worldwide, including all persons receiving employee complaints, shall maintain the confidentiality or, if the employee requests, the anonymity of the person making the complaint to the fullest extent reasonably practicable within the legitimate needs of law and any ensuing evaluation or investigation. Legal or business requirements may not allow for complete anonymity. Also, in some cases, it may not be possible to proceed with or properly conduct an investigation if the person making a complaint does not identify herself or himself. In addition, persons making complaints should be cautioned that their identity might become known for reasons outside of the control of Women Thrive Worldwide.

To assist Women Thrive Worldwide in the response to or investigation of a complaint, the complaint should be factual rather than speculative, and contain as much specific information as possible to allow for proper assessment of the nature, extent and urgency of the matter that is the subject of the complaint. Without limiting the foregoing, the complaint should, to the extent possible, contain the following information:

- a. the alleged event, matter or issue that is the subject of the complaint;
- b. the name of each person involved;
- c. if the complaint involves a specific event or events, the approximate date and location of each event; and
- d. any additional information, documentation or other evidence available to support the complaint.

Upon receipt of a complaint, the Board Chair or Treasurer will:

- e. determine whether the complaint actually pertains to Accounting Matters and
- f. when possible, acknowledge receipt of the complaint to the sender.

Complaints relating to Accounting Matters will be reviewed under Board direction and oversight by such persons as the Board determines to be appropriate. Confidentiality will be maintained to the fullest extent possible, consistent with the need to conduct an adequate review.

Prompt and appropriate corrective action will be taken when and as warranted in the judgment of the Board.

The chair of the Board will maintain a log of all complaints, tracking their receipt, investigation and resolution and shall prepare a periodic summary report thereof for the Board. Copies of complaints and such log will be maintained in accordance with Women Thrive Worldwide's document retention policy.