

THRIVETOGETHER

WHISTLEBLOWER POLICY

Effective Date: _____

Approved By: Board of Directors

ARTICLE I – PURPOSE

ThriveTogether ("Organization") is committed to operating with integrity, transparency, accountability, and compliance with all applicable laws and ethical standards.

The purpose of this Whistleblower Policy is to:

- Encourage good-faith reporting of concerns regarding actual or suspected misconduct;
- Protect individuals who report concerns from retaliation;
- Promote ethical conduct and legal compliance;
- Establish procedures for reporting and investigating concerns.

This policy applies to all directors, officers, employees, volunteers, contractors, committee members, and other individuals acting on behalf of ThriveTogether.

ARTICLE II – REPORTABLE CONCERNS

Individuals are encouraged to report concerns involving actual or suspected:

Financial Misconduct

- Fraud
- Theft
- Embezzlement
- Misappropriation of funds
- Falsification of financial records
- Improper accounting practices

Legal or Regulatory Violations

- Violations of federal, state, or local laws
- Violations of nonprofit regulations
- Violations of IRS requirements
- Failure to comply with grant requirements

Governance Violations

- Conflicts of interest not properly disclosed
- Abuse of authority
- Misuse of organizational assets
- Improper related-party transactions

Ethical Misconduct

- Dishonesty
- Unethical conduct
- Abuse, neglect, or exploitation of beneficiaries
- Animal welfare violations
- Harassment or discrimination

Safety Concerns

- Unsafe working conditions
- Threats to public safety
- Threats to volunteer safety
- Threats to animal welfare

ARTICLE III – GOOD-FAITH REPORTING

Individuals reporting concerns are expected to act in good faith and have a reasonable belief that the information disclosed is accurate.

A report does not need to be proven true before it is made.

Reports made knowingly false, maliciously, or with reckless disregard for the truth may result in disciplinary action.

ARTICLE IV – REPORTING PROCEDURES

Section 1. Reporting Channels

Concerns may be reported to:

- Executive Director
- Board President
- Board Vice President
- Chair of the Governance Committee
- Designated Compliance Officer

Section 2. Reporting Involving Leadership

If the concern involves the Executive Director, Board President, or another senior leader, the report should be made directly to a disinterested member of the Board of Directors.

Section 3. Anonymous Reports

Anonymous reports may be submitted.

While anonymous reports may limit the Organization's ability to investigate fully, ThriveTogether will review and investigate anonymous reports to the extent reasonably possible.

ARTICLE V – CONFIDENTIALITY

Reports shall be treated as confidential to the extent practical and consistent with the need to conduct a fair investigation.

Information shall be shared only with individuals who have a legitimate need to know.

The Organization cannot guarantee absolute confidentiality when disclosure is required by law or necessary to conduct a proper investigation.

ARTICLE VI – PROTECTION FROM RETALIATION

No director, officer, employee, volunteer, contractor, or other representative of ThriveTogether shall be subjected to retaliation for making a good-faith report under this Policy.

Prohibited retaliation includes:

- Termination
- Demotion
- Harassment
- Intimidation
- Threats
- Reduction of responsibilities
- Denial of opportunities
- Adverse treatment based on the report

Any person engaging in retaliation may be subject to disciplinary action, including removal from leadership positions, termination of employment, or termination of volunteer status.

ARTICLE VII – INVESTIGATION OF REPORTS

Section 1. Initial Review

Upon receipt of a report, the Organization shall conduct a preliminary review to determine:

- Whether the concern falls within the scope of this Policy;
- Whether further investigation is warranted.

Section 2. Investigation

The Organization may:

- Review documents and records;
- Interview relevant individuals;
- Consult legal counsel;
- Consult accountants, auditors, or subject-matter experts;
- Take other reasonable investigative measures.

Section 3. Board Oversight

Significant matters involving financial misconduct, legal violations, conflicts of interest, or senior leadership shall be reported to the Board of Directors.

ARTICLE VIII – CORRECTIVE ACTION

If misconduct is substantiated, ThriveTogether may take corrective action including:

- Policy revisions
 - Additional training
 - Increased oversight
 - Restitution
 - Removal from leadership positions
 - Termination of employment
 - Termination of volunteer service
 - Referral to law enforcement or regulatory authorities
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ARTICLE IX – RECORD RETENTION

Reports, investigations, findings, and related documents shall be maintained in accordance with the Organization's Document Retention and Destruction Policy.

Access to such records shall be limited to authorized individuals.

ARTICLE X – FALSE REPORTS

This Policy protects individuals who make reports in good faith.

Knowingly making false allegations, intentionally misleading investigators, or abusing this process may result in disciplinary action.

Failure to substantiate a concern after investigation shall not, by itself, be considered evidence of bad faith.

ARTICLE XI – RELATED-PARTY TRANSACTIONS

Concerns regarding transactions involving Donovan Asset Group LLC or any other related entity shall be reviewed in accordance with:

- The ThriveTogether Conflict of Interest Policy;
- Related-Party Transaction Review procedures;
- Applicable nonprofit governance standards.

Individuals reporting concerns regarding related-party transactions shall receive the same protections provided under this Policy.

ARTICLE XII – BOARD RESPONSIBILITY

The Board of Directors shall:

- Maintain oversight of this Policy;
 - Review significant whistleblower reports when appropriate;
 - Ensure reports are investigated fairly;
 - Ensure retaliation does not occur;
 - Periodically review and update this Policy.
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CERTIFICATION

The Board of Directors of ThriveTogether hereby adopts this Whistleblower Policy on:

Date: _____

BOARD PRESIDENT

Name: _____

Date: _____

SECRETARY

Name: _____

Date: _____