

WHISTLEBLOWER POLICY

Operation Courage is Beautiful (“OCIB”) 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 OCIB, we must practice honesty and integrity in fulfilling our responsibilities and comply with all applicable laws and regulations.

Article 1. Reporting Responsibility

This Whistleblower Policy is intended to encourage and enable employees, volunteers and others to raise serious concerns internally so that OCIB 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 OCIB’s code of ethics or suspected violations of law or regulations that govern OCIB’s operations.

Article 2. No Retaliation

It is contrary to the values of OCIB 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, suspected fraud, or suspected violation of any regulation governing the operations of OCIB. 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.

Article 3. Reporting Procedure

OCIB has an open-door policy and suggests that employees and volunteers 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. If you are not comfortable speaking with the Executive Director or you are not satisfied with the Executive Director’s response, you are encouraged to speak with the Compliance Committee of the Board of the Directors. OCIB’s Compliance Committee has the responsibility to investigate all reported complaints.

Article 4. Compliance Committee

OCIB’s Compliance Committee is responsible for ensuring that all complaints about

unethical or illegal conduct are investigated and resolved. The Compliance Committee will advise the Board of Directors of all complaints and resolution and will report at least annually to the Treasurer on compliance activity relating to accounting or alleged financial improprieties. Members of the Board of Directors may be a member of the Compliance Committee upon approval by the Board of Directors. There shall always be a minimum of 2 members.

Article 5. Accounting and Auditing Matters

OCIB's Compliance Committee shall immediately notify the Treasurer of any concerns or complaint regarding corporate accounting practices, internal controls or auditing and work with the Treasurer until the matter is resolved.

Article 6. 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.

Article 7. 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.

Article 8. Handling of Reported Violations

OCIB's Compliance Committee 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.

The Whistleblower Policy is Adopted this 25th day of April, 2017 by unanimous vote of the Board of Directors of OCIB.