



PURSUIT OF EXCELLENCE WHISTLEBLOWER POLICY

Pursuit of Excellence (hereinafter “POE”) requires its directors, volunteers and employees (if any) to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. The purpose of this policy is to encourage and enable volunteers and employees of POE to report any action or suspected action taken within POE that is illegal, fraudulent or in violation of any adopted policy of the organization, to a source within the organization before turning to outside parties for resolution. This policy applies to any matter which is related to POE’s business and does not relate to private acts of an individual not connected to the business of POE. This policy is intended to supplement but not replace POE’s discrimination, harassment and retaliation policy, or any other grievance procedure, or any applicable state and federal laws governing whistleblowing applicable to nonprofit and charitable organizations.

VIOLATIONS; REPORTING IN GOOD FAITH-- All volunteers and employees of POE are encouraged to report any action or suspected action taken within POE that is illegal, fraudulent, or in violation of any adopted policy of POE (each, a “Violation”). Anyone reporting a Violation must act in good faith, without malice to POE or any individual of POE and have reasonable grounds for believing that the information shared in the report indicates that a Violation has occurred. Any report which the complainant has made maliciously or any report which the complainant has good reason to believe is false will be viewed as a serious disciplinary offense.

NO RETALIATION--No volunteer or employee who in good faith reports a Violation or cooperates in the investigation of a Violation shall suffer harassment, retaliation, or adverse employment or volunteer consequences. Any individual within POE who retaliates against another individual who in good faith has reported a Violation or has cooperated in the investigation of a Violation is subject to discipline, including termination of employment or volunteer status. If an individual believes that someone who has made a report of a Violation or who has cooperated in the investigation of a Violation is suffering from harassment, retaliation, or other adverse employment or volunteer consequences, the individual should contact a member of the Board of Directors. Any individual who reasonably believes he or she has been retaliated against in violation of this policy shall follow the same procedures as for filing a complaint (outlined below).

REPORTING PROCESS--If an individual reasonably believes that a Violation has occurred, the individual is encouraged to share their questions, concerns, suggestions, or complaints with any person within POE who may be able to address them properly. In most cases, a member of the Board of Directors is the person best suited to address a concern. However, if an individual is not comfortable speaking with a member of the Board of Directors or if they are not satisfied with the member’s response, the individual is encouraged to speak directly to the President of the Board.

CONFIDENTIALITY—POE encourages anyone reporting a Violation to identify themselves when making a report in order to facilitate the investigation of the Violation. However, reports may be submitted on a confidential basis by the complainant or may be submitted anonymously. Reports of Violations or suspected Violations will be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation, to comply with all applicable laws, and to cooperate with law enforcement authorities. Furthermore, POE will explore anonymous allegations to the extent possible, but will weigh the prudence of continuing such investigations against the likelihood of confirming the alleged facts or circumstances from attributable sources.

HANDLING REPORTED VIOLATIONS-- The board member who receives a report of a Violation from the complainant is required to notify the other POE Board Members of that report. The POE Board will notify the complainant and acknowledge receipt of a report of Violation, but only to the extent that the complainant's identity is disclosed or a return address is provided. The POE Board, or their designee, is responsible for promptly investigating all reported Violations and for causing appropriate corrective actions to be taken if warranted by the investigation. The complainant will be notified about what actions will be taken, to the extent reasonably possible and consistent with any privacy or confidentiality limitations. If no further action or investigation is to follow, an explanation for the decision will be given to the complainant.

ACCOUNTING AND AUDITING MATTERS--The Treasurer is responsible for addressing all reported concerns or complaints of Violations relating to POE's accounting practices, internal controls, or auditing. Therefore, the members of the Board of Directors must immediately notify the Treasurer of any such concern or complaint.

* * * Adopted by the Board of Directors at its Meeting on October 21, 2024 * * *